

Exhibit A

Redacted in its entirety

Exhibit B

Redacted in its entirety

Exhibit C

Redacted: Pages 41 - 511

Public: Pages 512 - 518

Redacted: Pages 519 - 549

CONSULTING AGREEMENT

This Agreement is made and entered into as of July xx, 2020 (“Effective Date”) by and between James Alexander. (“Company”), having a principal place of business at 13535 Ventura Blvd., Suite C, PMB 405, Sherman Oaks, CA 91423 and Meghan Gardler (“Consultant”) having a principal place of business at 2203 Webster St, St 2, San Francisco CA 94115.

1. Engagement of Services. Company may issue Project Assignments to Consultant in the form attached to this Agreement as Exhibit A (Project Assignment). A Project Assignment will become binding when both parties have signed it and once signed, Consultant will be obligated to provide the services and to deliver the materials and deliverables as specified in each Project Assignment. The terms of this Agreement will govern all Project Assignments and services undertaken by Consultant for Company. Consultant represents, warrants and covenants that Consultant will perform the services under this Agreement in a timely, professional and workmanlike manner and that all materials and deliverables provided to Company will comply with (i) the requirements set forth in the Project Assignment, (ii) the documentation and specifications for those materials and deliverables, (iii) any samples or documents provided by Consultant to Company.

2. Compensation; Timing. Company will pay Consultant the fee set forth in each Project Assignment for the services provided as specified in that Project Assignment. The Company will reimburse Consultant’s documented, out-of-pocket expenses no later than thirty (10) days after Company’s receipt of Consultant’s invoice, per the Company’s expense policy in place at the time any such expense is incurred. Upon termination of this Agreement for any reason, Consultant will be (a) paid fees on the basis stated in the Project Assignment(s) and (b) reimbursed only for expenses that are properly incurred prior to termination of this Agreement and which are either expressly identified in a Project Assignment or approved in advance in writing by an authorized Company manager.

3. Independent Contractor Relationship. Consultant’s relationship with Company is that of an independent contractor, and nothing in this Agreement is intended to, or shall be construed to, create a partnership, agency, joint venture, employment or similar relationship. Consultant shall refer to relationship with Company as encompassing “Consulting or Advisory”. Consultant will not be entitled to any of the benefits that Company may make available to its employees, including, but not limited to, group health or life insurance, profit sharing or retirement benefits. Consultant is not authorized to make any representation, contract or commitment on behalf of Company unless specifically requested or authorized in writing to do so by a Company manager. Consultant is solely responsible for, and will file, on a timely basis, all tax returns and payments required to be filed with, or made to, any federal, state or local tax authority with respect to the performance of services and receipt of fees under this Agreement. Consultant is solely responsible for, and must maintain adequate records of, expenses incurred in the course of performing services under this Agreement. No part of Consultant’s compensation will be subject to withholding by Company for the payment of any social security, federal, state or any other employee payroll taxes. Company will regularly report amounts paid to Consultant by filing Form 1099MISC with the Internal Revenue Service as required by law.

4. Disclosure and Assignment of Work Resulting from Project Assignments.

4.1. “Innovations” and “Company Innovations” Definitions. In this Agreement, “Innovations” means all discoveries, designs, developments, improvements, inventions (whether or not protectable under patent laws), works of authorship, information fixed in any tangible medium of expression (whether or not protectable under copyright laws), trade secrets, know-how, ideas (whether or not protectable under trade secret laws), mask works, trademarks, service marks, trade names and trade

dress. “Company Innovations” means Innovations that Consultant, solely or jointly with others, creates, derives, conceives, develops, makes or reduces to practice under a Project Assignment.

4.2. Disclosure and Assignment of Company Innovations. Consultant agrees to maintain adequate and current records of all Company Innovations, which records shall be and remain the property of Company. Consultant agrees to promptly disclose and describe to Company all Company Innovations. Consultant represents, warrants and covenants that all Company Innovations shall be free and clear of any liens and encumbrances. Consultant hereby does and will irrevocably assign to Company or Company’s designee all of Consultant’s right, title and interest in and to any and all Company Innovations and all associated records, such assignment to occur with respect to each Company Innovation at the time the Company Innovation is first conceived, made, derived, developed, written or created, and regardless of when the Company Innovation is first conceived, made, derived, developed, written or created. To the extent any of the rights, title and interest in and to Company Innovations cannot be assigned by Consultant to Company, Consultant hereby grants to Company an exclusive, royalty-free, transferable, irrevocable, worldwide, fully paid-up license (with rights to sublicense through multiple tiers of sublicensees) to fully use, practice and exploit those non-assignable rights, title and interest, including, but not limited to, the right to make, use, sell, offer for sale, import, have made, and have sold, the Company Innovations. To the extent any of the rights, title and interest in and to the Company Innovations can neither be assigned nor licensed by Consultant to Company, Consultant hereby irrevocably waives and agrees never to assert the non-assignable and non-licensable rights, title and interest against Company, any of Company’s successors in interest, or any of Company’s customers. If any Company Innovations include any work of authorship that qualifies as a “work made for hire” as defined in subclause (2) under Section 101 of the Copyright Law of the United States (Title 17 of the United States Code, as may be amended from time to time), Company and Consultant agree that Company owns such work of authorship as a work made for hire under such section.

4.3. Assistance. Consultant agrees to perform, during and after the term of this Agreement, all acts that Company deems necessary or desirable to permit and assist Company, at its expense, in obtaining, perfecting and enforcing the full benefits, enjoyment, rights and title throughout the world in the Company Innovations as provided to Company under this Agreement. If Company is unable for any reason to secure Consultant’s signature to any document required to file, prosecute, register or memorialize the assignment of any rights under any Company Innovations as provided under this Agreement, Consultant hereby irrevocably designates and appoints Company and Company’s duly authorized officers and agents as Consultant’s agents and attorneys-in-fact to act for and on Consultant’s behalf and instead of Consultant to take all lawfully permitted acts to further the filing, prosecution, registration, memorialization of assignment, issuance and enforcement of rights in, to and under the Company Innovations, all with the same legal force and effect as if executed by Consultant. The foregoing is deemed a power coupled with an interest and is irrevocable.

4.4. Consultant Out-of-Scope Innovations. If Consultant incorporates or permits to be incorporated any Innovations relating in any way, at the time of conception, reduction to practice, creation, derivation, development or making of the Innovation, to Company’s business or actual or demonstrably anticipated research or development but which were conceived, reduced to practice, created, derived, developed or made by Consultant (solely or jointly) either unrelated to Consultant’s work for Company under this Agreement or prior to the Effective Date (collectively, the “Out-of-Scope Innovations”) into any of the Company Innovations, then Consultant hereby grants to Company and Company’s designees a royalty-free, transferable, irrevocable, worldwide, fully paid-up license (with rights to sublicense through multiple tiers of sublicensees) to fully use, practice and exploit all patent, copyright, moral right, mask work, trade secret and other intellectual property rights relating to the Out-of-Scope Innovations. Notwithstanding the foregoing, Consultant agrees that Consultant shall not incorporate, or permit to be

incorporated, any Innovations conceived, reduced to practice, created, derived, developed or made by others or any Out-of-Scope Innovations into any Company Innovations without Company's prior written consent.

4.5. Assignment by Employees of Consultant. Consultant covenants, represents and warrants that each of Consultant's employees who perform services under this Agreement has or will have a written agreement with Consultant that provides Consultant with all necessary rights to fulfill its obligations under this Agreement, including but not limited to the obligations of this Section 4.

5. Confidentiality.

5.1. Definition of Confidential Information. "Confidential Information" means (a) any technical and non-technical information related to the Company's business and current, future and proposed products and services of Company, including for example and without limitation, Company Innovations, Company Property (as defined in Section 6 (Ownership and Return of Confidential Information and Company Property)), and Company's information concerning research, development, design details and specifications, financial information, procurement requirements, engineering and manufacturing information, customer lists, business forecasts, sales information, marketing plans and business plans, in each case whether or not marked as "confidential" or "proprietary" and (b) any information that Company has received from others that may be made known to Consultant and that Company is obligated to treat as confidential or proprietary, whether or not marked as "confidential" or "proprietary".

5.2. Nondisclosure and Nonuse Obligations. Except as permitted in this Section, Consultant will not (i) use any Confidential Information or (ii) disseminate or in any way disclose the Confidential Information to any person, firm, business or governmental agency or department. Consultant may use the Confidential Information solely to perform Project Assignment(s) for the benefit of Company. Consultant shall treat all Confidential Information with the same degree of care as Consultant accords to Consultant's own confidential information, but in no case shall Consultant use less than reasonable care. If Consultant is not an individual, Consultant shall disclose Confidential Information only to those of Consultant's employees who have a need to know the information as necessary for Consultant to perform this Agreement. Consultant certifies that each of its employees will have agreed, either as a condition of employment or in order to obtain the Confidential Information, to be bound by terms and conditions at least as protective as those terms and conditions applicable to Consultant under this Agreement. Consultant shall immediately give notice to Company of any unauthorized use or disclosure of the Confidential Information. Consultant shall assist Company in remedying any the unauthorized use or disclosure of the Confidential Information. Consultant agrees not to communicate any information to Company in violation of the proprietary rights of any third party.

5.3. Exclusions from Nondisclosure and Nonuse Obligations. Consultant's obligations under Section 5.2 do not apply to any Confidential Information that Consultant can demonstrate (a) was in the public domain at or subsequent to the time the Confidential Information was communicated to Consultant by Company through no fault of Consultant; (b) was rightfully in Consultant's possession free of any obligation of confidence at or subsequent to the time the Confidential Information was communicated to Consultant by Company; or (c) was independently developed by employees of Consultant without use of, or reference to, any Confidential Information communicated to Consultant by Company. A disclosure of any Confidential Information by Consultant (a) in response to a valid order by a court or other governmental body or (b) as otherwise required by law will not be considered to be a breach of this Agreement or a waiver of confidentiality for other purposes; provided, however, that Consultant provides prompt prior written notice thereof to Company to enable Company to seek a protective order or otherwise prevent the disclosure.

6. Ownership and Return of Confidential Information and Company Property. All Confidential Information and any materials and items (including, without limitation, software, equipment, tools, artwork, documents, drawings, papers, diskettes, tapes, models, apparatus, sketches, designs and lists) that Company furnishes to Consultant by Company, whether delivered to Consultant by Company or made by Consultant in the performance of services under this Agreement and whether or not they contain or disclose Confidential Information (collectively, the “Company Property”), are the sole and exclusive property of Company or Company’s suppliers or customers. Consultant agrees to keep all Company Property at Consultant’s premises unless otherwise permitted in writing by Company. Within five (5) days after any request by Company, Consultant shall destroy or delete electronic records of, (a) all Company Property and (b) all materials and items in Consultant’s possession or control that contain or disclose any Confidential Information. Consultant will provide Company a written certification of Consultant’s compliance with Consultant’s obligations under this Section.

7. Indemnification. Consultant will indemnify and hold harmless Company from and against any and all third party claims, suits, actions, demands and proceedings against Company and all losses, costs and liabilities related thereto arising out of or related to (i) an allegation that any item, material and other deliverable delivered by Consultant under this Agreement infringes any intellectual property rights or publicity rights of a third party or (ii) any negligence by Consultant or any other act or omission of Consultant, including without limitation any breach of this Agreement by Consultant.

8. Observance of Company Rules. At all times while on Company’s premises, Consultant will observe Company’s rules and regulations with respect to conduct, health, safety and protection of persons and property.

9. No Conflict of Interest. During the term of this Agreement, Consultant will not accept work, enter into a contract or accept an obligation inconsistent or incompatible with Consultant’s obligations, or the scope of services to be rendered for Company, under this Agreement. Consultant warrants that, to the best of Consultant’s knowledge, there is no other existing contract or duty on Consultant’s part that conflicts with or is inconsistent with this Agreement. Consultant agrees to indemnify and hold harmless Company from any and all losses and liabilities incurred or suffered by Company by reason of the alleged breach by Consultant of any services agreement between Consultant and any third party.

10. Term and Termination.

10.1. Term. This Agreement is effective as of the Effective Date set forth above and will terminate on December 31, 2020 unless renewed or terminated earlier. Any renewal will be effective for 90 days, subject to earlier termination as set forth below. A renewal by Company or Consultant must be received in writing on, or before the termination date and accepted by the other party.

10.2. Termination by Company. Except during the term of a Project Assignment, Company may terminate this Agreement without cause at any time, with termination effective fifteen (15) days after Company’s delivery to Consultant of written notice of termination. Company also may terminate this Agreement (a) immediately upon Consultant’s breach of Section 4 (Disclosure and Assignment of Work Resulting from Project Assignments), 5 (Confidentiality) or 11 (Noninterference with Business) or

(b) immediately for a breach by Consultant if Consultant’s breach of any other provision under this Agreement or obligation under a Project Assignment is not cured within ten (10) days after the date of Company’s written notice of breach. Company may terminate a Project Assignment at any time upon three

(3) days’ prior written notice to Consultant and, in that event, Company will pay Consultant for services properly performed prior to the date of termination.

10.3. Termination by Consultant. Except during the term of a Project Assignment, Consultant may terminate this Agreement without cause at any time, with termination effective fifteen (15) days after Consultant's delivery to Company of written notice of termination. Consultant also may terminate this Agreement immediately for a material breach by Company if Company's material breach of any provision of this Agreement is not cured within ten (10) days after the date of Consultant's written notice of breach.

Effect of Expiration or Termination. Upon expiration or termination of this Agreement, Company shall pay Consultant for services properly performed under this Agreement as set forth in each then pending Project Assignment.

10.4. The definitions contained in this Agreement and the rights and obligations contained in this Section and Sections 4 (Disclosure and Assignment of Work Resulting from Project Assignments), 5 (Confidentiality), 6 (Ownership and Return of Confidential Information and Company Property), 7 (Indemnification), 11 (Noninterference with Business) and 12 (General Provisions) will survive any termination or expiration of this Agreement.

11. Noninterference with Business. During this Agreement, and for a period of two (2) years immediately following the termination or expiration of this Agreement, Consultant agrees not to solicit or induce any employee or independent contractor involved in the performance of this Agreement to terminate or breach an employment, contractual or other relationship with Company.

12. General Provisions.

12.1. Successors and Assigns. Consultant shall not assign its rights or delegate any performance under this Agreement without the prior written consent of Company. For the avoidance of doubt, Consultant may not subcontract performance of any services under this Agreement to any other contractor or consultant without Company's prior written consent. All assignments of rights by Consultant are prohibited under this paragraph, whether they are voluntary or involuntary, by merger, consolidation, dissolution, operation of law, or any other manner. For purposes of this paragraph, (i) a "change of control" is deemed an assignment of rights; and (ii) "merger" refers to any merger in which Consultant participates, regardless of whether it is the surviving or disappearing entity. Any purported assignment of rights or delegation of performance in violation of this paragraph is void. This Agreement will be for the benefit of Company's successors and assigns and will be binding on Consultant's permitted assignees.

12.2. Injunctive Relief. Consultant's obligations under this Agreement are of a unique character that gives them particular value; Consultant's breach of any of these obligations will cause irreparable and continuing damage to Company for which money damages are insufficient, and Company is entitled to injunctive relief, a decree for specific performance, and all other relief as may be proper (including money damages if appropriate), without the need to post a bond.

12.3. Notices. Any notice required or permitted by this Agreement shall be in writing and shall be delivered as follows, with notice deemed given as indicated: (a) by personal delivery, when actually delivered; (b) by overnight courier, upon written verification of receipt; (c) by facsimile transmission, upon acknowledgment of receipt of electronic transmission; or (d) by certified or registered mail, return receipt requested, upon verification of receipt. Notice shall be sent to the addresses set forth above or to such other address as either party may provide in writing.

12.4. Governing Law; Forum. The laws of the United States of America and the State of California govern all matters arising out of or relating to this Agreement without giving effect to any conflict of law principles. Each of the parties irrevocably consents to the exclusive personal jurisdiction of

the federal and state courts located in Los Angeles County, California, as applicable, for any matter arising out of or relating to this Agreement, except that in actions seeking to enforce any order or any judgment of the federal or state courts located in Los Angeles County, California, personal jurisdiction will be non-exclusive. Additionally, notwithstanding anything in the foregoing to the contrary, a claim for equitable relief arising out of or related to this Agreement may be brought in any court of competent jurisdiction. If a proceeding is commenced to resolve any dispute that arises between the parties with respect to the matters covered by this Agreement, the prevailing party in that proceeding is entitled to receive its reasonable attorneys' fees, expert witness fees and out-of-pocket costs, in addition to any other relief to which that prevailing party may be entitled.

12.5. Severability. If a court of law holds any provision of this Agreement to be illegal, invalid or unenforceable, (a) that provision shall be deemed amended to achieve an economic effect that is as near as possible to that provided by the original provision and (b) the legality, validity and enforceability of the remaining provisions of this Agreement shall not be affected.


12.6. Waiver; Modification. If Company waives any term, provision or Consultant's breach of this Agreement, such waiver shall not be effective unless it is in writing and signed by Company. No waiver by a party of a breach of this Agreement shall constitute a waiver of any other or subsequent breach by Consultant. This Agreement may be modified only by mutual written agreement of authorized representatives of the parties.

12.7. Entire Agreement. This Agreement constitutes the final and exclusive agreement between the parties relating to this subject matter and supersedes all agreements, whether prior or contemporaneous, written or oral, concerning such subject matter.

IN WITNESS WHEREOF, the parties are signing this Project Assignment as of the later date below.

"Company"

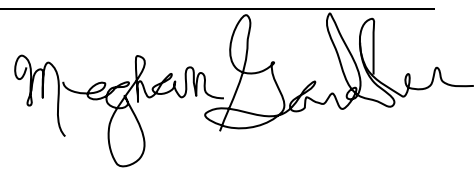
JAMES ALEXANDER

By:  _____

Date: : 07/27/2020

"Consultant"

MEGHAN GARDLER

By:  _____

Date: 07/27/2020

Exhibit A

PROJECT ASSIGNMENT

Services and Deliverables to be ProvidedMilestones and Milestone Dates for Completion of the Services and Delivery of the Deliverables

1. Marketing – provide Company with a comprehensive 30/60/90 day plan and GTM strategy to distribute crypto financial products and wealth management services. The plan will be including but not limited to the following:
 - Outline of digital marketing including email, social media, website, SEO, digital lead generation, etc.
 - Branding, value proposition, press kit.
 - Public Relations and media strategy when ready for wider launch
2. Prospects – curate lists of prospective clients.
3. Sales Support – support the development and execution of marketing plan to potential clients.
4. KPI Metrics – deliver framework for measuring performance. And criteria for payment of Bonus.

2020 Milestones

1. Minimum 10 hours per week.
2. 30/60/90 Day Plan due within 1 week of Effective Date.
3. KPI Metrics due within 30 days of Effective Date.
4. Weekly – KPI review to track key metrics.
5. Monthly – At least calendar monthly, a debrief session up to half-day.
6. Quarterly – review.

Acceptance Criteria

Consultant shall provide deliverables based on estimated dates and may from time to time revise the updated delivery dates subject to acceptance by the Company.

Acceptance Procedure

Consultant may provide written request for acceptance of delivery of deliverables and which Company will accept within 72 hours or provide written revisions required for acceptance.

Payment of Fees. 12,000 USDC per calendar month, paid bi-monthly in arrears to Meghan Gardler: Wells Fargo Bank

ACCT #: 6200019484 ROUTING: 031000503

Payment of Bonus. An annual discretionary bonus of up to 30% of annualized Fees (7.5% quarterly), payable within 30 days of each calendar quarter, will be available based on KPI Metrics. The amount payable will be at the sole discretion of the Company.

Expenses. Company will reimburse Consultant for any pre-approved expenses incurred in connection with this Project Assignment upon receipt of proper documentation of those expenses from Consultant, subject to the Company's expense policy in place at the time the expense is incurred.

Exhibit D

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
CRED INC., et al.,)
Debtors.)
_____)
CRED INC., CRED CAPITAL,)
INC., and CRED(US)LLC,)
Plaintiffs,)
V.)Case No. 20-12836(JTD)
JAMES ALEXANDER,)
Defendant.)
_____)

VIDEOTAPED REMOTE DEPOSITION OF JAMES ALEXANDER
Deponent testifying from Los Angeles, California
Tuesday, February 9, 2021
Volume I

Stenographically Reported By:
Melissa M. Villagran, RPR
CSR No. 12543
Job No. 4455511

PAGES 1 - 137

Page 1

<p>1 IN THE UNITED STATES BANKRUPTCY COURT 2 FOR THE DISTRICT OF DELAWARE 3 4 In re:) 5 CRED INC., et al.,) 6 Debtors.) 7) 8 CRED INC., CRED CAPITAL,) 9 INC., and CRED(US)LLC,) 10 Plaintiffs,) 11 V.)Case No. 20-12836(JTD) 12 JAMES ALEXANDER,) 13 Defendant.) 14) 15 16 17 Videotaped Remote deposition of JAMES 18 ALEXANDER, Volume I, taken on behalf of Plaintiffs. 19 Deponent testifying from Los Angeles, California, 20 beginning at 12:07 p.m. and ending at 4:35 p.m. on 21 Tuesday, February 9, 2021, before Melissa M. 22 Villagran, RPR, Certified Shorthand Reporter 23 No. 12543. 24 25</p> <p style="text-align: right;">Page 2</p>	<p>1 APPEARANCES (Continued): 2 3 COUSINS LAW, LLC 4 BY: SCOTT COUSINS 5 Attorney at Law 6 1521 Concord Pike 7 Wilmington, DE 19803 8 302.549.0186 9 10 BROWN RUDNICK 11 BY: PATRICK GILMAN 12 Attorney at Law 13 601 Thirteenth Street NW, Suite 600 14 Washington, District of Columbia 20005 15 202.536.1700 16 Pgilman@brownrudnick.com 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 4</p>
<p>1 APPEARANCES: 2 (ALL ATTENDEES APPEARING REMOTELY) 3 4 BUCHANAN INGERSOLL ROONEY 5 BY: GEOFFREY GRIVNER 6 Attorney at Law 7 50 South 16th Street, Suite 3200 8 Philadelphia, Pennsylvania 19102 9 215.665.3921 10 Geoffrey.grivner@bipc.com 11 12 For Defendants: 13 PAUL HASTINGS 14 BY: AVI LUFT 15 SCOTT CARLTON 16 Attorneys at Law 17 515 South Flower Street, #25 18 Los Angeles, California 90071 19 213.683.6105 20 Scottcarlton@paulhastings.com 21 Aviluft@paulhastings.com 22 23 24 25</p> <p style="text-align: right;">Page 3</p>	<p>1 APPEARANCES (Continued): 2 3 For U.S. Trustees: 4 OFFICE OF THE U.S. TRUSTEE 5 BY: JOSEPH McMAHON, ESQ. 6 Attorney at Law 7 1313 North Market Street 8 Wilmington, Delaware 19801 9 302.573.6277 10 Joseph.mcmahon@usdoj.com 11 12 Counsel to the Official Committee of Unsecured 13 Creditors: 14 McDERMOTT WILL & EMERY 15 BY: JOSEPH B. EVANS 16 TIMOTHY W. WALSH 17 DARREN AZMAN 18 SAMUEL ASHWORTH 19 Attorneys at Law 20 340 Madison Avenue 21 New York, New York 10173-1922 22 212.547.5400 23 jbevans@mwe.com 24 25</p> <p style="text-align: right;">Page 5</p>

1 APPEARANCES (Continued):	1 INDEX (CONTINUED)
2	2
3 Videographer:	3 EXHIBITS
4 Brandon Miller	4 DEPOSITION PAGE
5	5 Exhibit G July 31, 2020 JPMorgan Chase 95
6	6 Bank Account Statement
7	7
8	8 Exhibit H Wells Fargo Account Statement 102
9	9
10	10 Exhibit I Excel Spreadsheet 108
11	11
12	12 Exhibit J Coinbase Account Statement 111
13	13
14	14
15	15
16	16
17	17 PREVIOUSLY MARKED EXHIBITS
18	18 (None.)
19	19
20	20 INFORMATION REQUESTED
21	21 (None.)
22	22
23	23 INSTRUCTION NOT TO ANSWER
24	24 (None.)
25	25
Page 6	Page 8
1 INDEX	1 Los Angeles, California, Tuesday, February 9, 2021
2	2 12:07 p.m.
3 DEPONENT EXAMINATION	3
4 JAMES ALEXANDER	4 THE VIDEOGRAPHER: Good afternoon. We're
5 Volume I	5 going on the record at 12:07 p.m. Pacific Standard 12:07:13
6 BY MR. EVANS 11	6 Time on February 9th, 2021.
7	7 Please note the microphones are very, very
8	8 sensitive and may pick up whispering. However,
9 EXHIBITS	9 please speak slowly with your voices up at all
10 DEPOSITION PAGE	10 times. 12:07:33
11 Exhibit A Wells Fargo Account Detail 42	11 Please silence all cell phones and place away
12	12 from microphones, as they can interfere with
13 Exhibit B January 31, 2021 Wells Fargo 62	13 deposition audio.
14 Bank Statement	14 Audio and video recording will continue to
15	15 take place, unless all parties agree to go off the 12:07:39
16 Exhibit C Declaration of James Alexander 68	16 record.
17	17 This is Media No. 1 of the video-recorded
18 Exhibit D Interrogatory Responses 69	18 deposition of James Alexander taken by counsel in
19	19 the matter of "In re Cred Inc. et al." filed in
20 Exhibit E Coinbase Transaction Report 74	20 United States Bankruptcy Court, the District of 12:07:58
21	21 Delaware. Case No. is 20-12836(JTD), Jointly
22 Exhibit F Temporary Restraining Order and 85	22 Administered Adversary Proceeding No. 20-51006.
23 Preliminary Injunction	23 This deposition is taking place via virtual
24	24 Zoom, and all participants are appearing remotely.
25	25 My name is Brandon Miller from the firm 12:08:26
Page 7	Page 9

3 (Pages 6 - 9)

<p>1 Veritext Legal Solutions, and I'm the videographer. 2 The court reporter is Melissa Villagran from the 3 firm Veritext Legal Solutions. I am not related to 4 any party in this action, nor am I financially 5 interested in the outcome. 12:08:39 6 Counsel and all present in the rooms and 7 everyone attending remotely will now state their 8 appearances and affiliations for the record, 9 beginning with the noticing attorney, and the 10 witness may be sworn in. 12:08:53 11 MR. EVANS: Joseph Evans from McDermott Will 12 & Emery on behalf of the Official Committee of 13 Unsecured Creditors. I'm here with my colleagues, 14 Timothy Walsh and Samuel Ashworth. 15 MR. GRIVNER: Geoffrey Grivner of Buchanan 12:09:07 16 Ingersoll & Rooney on behalf of the witness, 17 Mr. Alexander. 18 MR. LUFT: Avi Luft of Paul Hastings on 19 behalf of the debtor. With me is my colleague, 20 Scott Carlton, and my colleague, Scott Cousins of 12:09:10 21 the Cousins Law Firm, and my colleague, Mack Wilson, 22 will be joining us later. 23 MR. GILMAN: This is Patrick Gilman with 24 Brown Rudwick. I represent the examiner in this 25 matter, Robert Stark. 12:09:31</p> <p style="text-align: right;">Page 10</p>	<p>1 I know we're virtual. 2 There's no one else in the room with you 3 today, is there? 4 A Sorry? 5 Q Is there anyone else in the room with you 12:10:40 6 today? 7 A No. No. 8 Q Okay. 9 And I know you probably have your cell phone 10 on you. I would ask that you not text or 12:10:49 11 communication with anyone while this deposition is 12 pending, unless you are speaking with your lawyer 13 during a break. 14 A Okay. 15 I'm trying to pause these incoming messages. 12:10:59 16 I'm not sure how to do it. 17 Can you just bear with me for a second? 18 MR. GRIVNER: Mr. Evans, I will note that 19 while Mr. Alexander is working on that, that the 20 scope of this deposition is limited to the order as 12:11:28 21 issued by -- by the judge previously, and I may 22 instruct the witness not to answer questions if it's 23 beyond the scope of the limited scope of the 24 deposition, as ordered by the judge in this case. 25 MR. EVANS: I'm not sure what your definition 12:11:50</p> <p style="text-align: right;">Page 12</p>
<p>1 MR. McMAHON: Joseph McMahon, Office of the 2 United States Trustee, Wilmington, Delaware, 3 representing Andrew Vera, the United States trustee 4 for Region 3. 5 12:09:42 6 EXAMINATION 7 BY MR. EVANS: 8 Q Good afternoon, Mr. Alexander. 9 A Good afternoon. 10 Q I'm going to be asking you some questions 12:09:55 11 today, and I just want to go over some ground rules. 12 We're going to try not to speak over each 13 other. It's a little difficult on Zoom. We have a 14 court reporter here, so I'm going to try to speak 15 slowly, and I ask that you do the same. 12:10:06 16 I'm going to ask you a series of questions. 17 We ask for your full and honest answer. 18 Your lawyer is present with you today. He 19 may object to certain questions. Unless the 20 objection is on the basis of privilege, you are 12:10:19 21 required to answer those questions, and you cannot 22 consult anyone while a question is pending. 23 Do you understand that? 24 A Yes. 25 Q Okay. 12:10:33</p> <p style="text-align: right;">Page 11</p>	<p>1 is of the scope, Geoffrey, but I'll take your 2 objections as you raise them. 3 MR. LUFT: Why don't we go off the record 4 while he fixes his problem. 5 MR. EVANS: Agreed. 12:12:10 6 THE VIDEOGRAPHER: Okay. Stand by, please. 7 This marks the end of Media No. 1. Going off the 8 record at 12:12 p.m. Pacific. 9 (Recess.) 10 THE VIDEOGRAPHER: We are back on the record 12:14:17 11 at 12:14 p.m. Pacific, and this marks the beginning 12 of Media No. 2, deposition of James Alexander. 13 You may proceed, Counsel. 14 BY MR. EVANS: 15 Q Mr. Alexander, what is your full legal name? 12:14:34 16 A James Alexander. 17 Q Do you have a middle name? 18 A No middle name. 19 Q Okay. 20 So just James Alexander. 12:14:44 21 Where do you live? 22 A California. 23 Do you want to be more specific than that or? 24 Q Yes. What is your current address? 25 A My current mailing address or home address? 12:14:57</p> <p style="text-align: right;">Page 13</p>

<p>1 Q Both.</p> <p>2 A Current mailing address is 13535 Ventura</p> <p>3 Boulevard. And that's Suite C405. That's Sherman</p> <p>4 Oaks, California 91423.</p> <p>5 Did you say you wanted my home? 12:15:21</p> <p>6 Q Home and business, yes, please.</p> <p>7 A The home address is 3551 Dixie Canyon Place.</p> <p>8 That's Sherman Oaks, California 91423.</p> <p>9 Q Okay.</p> <p>10 And how long have you lived at that address? 12:15:35</p> <p>11 A About a year.</p> <p>12 Q Where did you live prior to that?</p> <p>13 A Do you -- do you want the address?</p> <p>14 Q Yes.</p> <p>15 A The address is 4051 Finley, spelled 12:15:48</p> <p>16 F-i-n-l-e-y, Avenue. That's Apartment 6, Los</p> <p>17 Angeles, California 90027.</p> <p>18 Q And how long did you reside at that address?</p> <p>19 A Four years.</p> <p>20 Q Prior to that? 12:16:02</p> <p>21 A Prior to that. Prior to that...</p> <p>22 Q Where did you reside?</p> <p>23 A Do you want the address?</p> <p>24 Q Yes.</p> <p>25 A The address prior to that was 427 Alma 12:16:16</p> <p style="text-align: right;">Page 14</p>	<p>1 Q Do you know how much is owed on that</p> <p>2 mortgage?</p> <p>3 A It's -- I can -- I can give you an</p> <p>4 approximate amount. Is that what you're looking</p> <p>5 for? 12:17:47</p> <p>6 Q Sure.</p> <p>7 A Approximately a million dollars.</p> <p>8 Q And do you have a sense as to the total value</p> <p>9 of the house, at least when you purchased it? I</p> <p>10 assume it was a year ago. 12:17:55</p> <p>11 A 1.260.</p> <p>12 Q And just -- you did purchase that a year ago,</p> <p>13 right?</p> <p>14 A About a year ago. I don't recall the exact</p> <p>15 date. 12:18:07</p> <p>16 Q Do you hold a current passport?</p> <p>17 A Sorry?</p> <p>18 Q Do you have a passport?</p> <p>19 A I do, yes.</p> <p>20 Q When is the last time that you left the 12:18:18</p> <p>21 United States?</p> <p>22 A I don't -- I don't recall. I would have to</p> <p>23 look back at my records.</p> <p>24 Q Have you left the United States in the last</p> <p>25 six months? 12:18:33</p> <p style="text-align: right;">Page 16</p>
<p>1 Street, Palo Alto, California 94301.</p> <p>2 Q And your current residence, do you live there</p> <p>3 alone, or do you live with anyone else?</p> <p>4 A I live -- I don't live alone. I live with my</p> <p>5 family. 12:16:46</p> <p>6 Q Okay.</p> <p>7 Are you married?</p> <p>8 A Yes.</p> <p>9 Q What's your spouse's name?</p> <p>10 A Alyiah Alexander. A-l-y-i-a-h, if you're -- 12:16:49</p> <p>11 Q Do you have children?</p> <p>12 A Yes.</p> <p>13 Q How many?</p> <p>14 A Two.</p> <p>15 Q Age? 12:17:03</p> <p>16 A 18 months, year-and-a-half.</p> <p>17 Q Both of them?</p> <p>18 A Yes.</p> <p>19 Q And your current address, do you own it? Do</p> <p>20 you rent? What's the status? 12:17:17</p> <p>21 A The status of our house?</p> <p>22 Q Yes.</p> <p>23 A We own.</p> <p>24 Q And is there a mortgage on that house?</p> <p>25 A There is, yes. 12:17:30</p> <p style="text-align: right;">Page 15</p>	<p>1 A What month are we now? I -- I -- I would</p> <p>2 have to check my records. Sorry. I can't recall.</p> <p>3 Q When did you first become involved with</p> <p>4 cryptocurrency?</p> <p>5 A Can -- can -- can you clarify the question? 12:18:54</p> <p>6 What do you mean?</p> <p>7 Q We can take it in a few parts, then.</p> <p>8 When did you first purchase cryptocurrency of</p> <p>9 any kind?</p> <p>10 A I don't recall the exact date. I would have 12:19:09</p> <p>11 to look at my records.</p> <p>12 Are you looking for an approximate date or?</p> <p>13 Q Sure. Give me an approximate year. Give me</p> <p>14 a year. That's all I need.</p> <p>15 A So are you -- are you talking about purchase 12:19:32</p> <p>16 cryptocurrency for myself, or in the contracts of my</p> <p>17 employment? I -- I -- I'm trying to understand</p> <p>18 the -- the line of question.</p> <p>19 Q I was talking when you personally first</p> <p>20 purchased cryptocurrency either for yourself or for 12:19:48</p> <p>21 a company. I'm just asking how long you have been</p> <p>22 involved with cryptocurrency.</p> <p>23 COURT REPORTER: Can we -- hold on. Can</p> <p>24 we -- hold on. Can we go off the record, please?</p> <p>25 MR. EVANS: Yeah. 12:19:58</p> <p style="text-align: right;">Page 17</p>

<p>1 THE VIDEOGRAPHER: Stand by. Going off the 2 record at 12:20 Pacific. 3 (Recess.) 4 THE VIDEOGRAPHER: We are back on the record 5 at 12:25 p.m. Pacific, and this marks the beginning 12:25:05 6 of Media No. 3, deposition of James Alexander. 7 We also need to still swear in the witness 8 for this proceeding. Would you please do that now, 9 Madam Court Reporter? 10 COURT REPORTER: Mr. Alexander, please raise 11 your right hand. 12 Do you solemnly swear that the testimony you 13 are about to give will be the truth, the whole 14 truth, and nothing but the truth, so help you God? 15 THE DEPONENT: I do. 12:25:33 16 THE VIDEOGRAPHER: Thank you. 17 You may proceed. 18 19 JAMES ALEXANDER, 20 having been administered an oath, was examined and 12:25:34 21 testified as follows: 22 23 BY MR. EVANS: 24 Q When did you first purchase cryptocurrency? 25 A Could you clarify the question? Is it for 12:25:41</p> <p style="text-align: right;">Page 18</p>	<p>1 is, but prior to Cred, did you work at any companies 2 that had any involvement with cryptocurrency 3 whatsoever? 4 A I -- I don't know. I -- I can't answer that 5 question. There were companies that dealt in crypto 12:27:16 6 and I wasn't aware of them dealing in crypto. I 7 can't -- I can't confirm or answer that question. 8 Q Okay. 9 We'll go the long way then. 10 Where did you go to college? 12:27:27 11 A Where did I attend or where did I graduate 12 from? 13 Q Where did you graduate? 14 A At Western University. 15 Q Where did you work after that? 12:27:39 16 A I worked in financial services. 17 Q What company did you work for after college? 18 A I don't have my résumé in front of me. I 19 can't answer that without my full résumé. 20 Q You don't remember your first job out of 12:27:51 21 college? Is that what you are saying today? 22 A That is correct. It was 20-some years ago, 23 30 years ago. 24 Q What about your second job out of college? 25 Do you remember that, or you don't remember that 12:28:08</p> <p style="text-align: right;">Page 20</p>
<p>1 myself or for company as directed by me or as done 2 by me directly? 3 Q Let's do them both ways. When did you first 4 purchase cryptocurrency for yourself? 5 A I -- I don't recall. I would have to look 12:25:58 6 back at my records. 7 Q Can you give me a ballpark? What year? 8 A Approximately 2020 is my -- but I -- that's 9 an estimate. 10 Q Okay. 12:26:11 11 So prior to 2020, you don't recall purchasing 12 any cryptocurrency for yourself? 13 A That's correct. 14 Q When is the first time that you worked in a 15 company that was in the cryptocurrency industry? 12:26:27 16 A The first time I worked. Was employed? 17 Q Worked, employed, yeah, sure. 18 A August of 2018. 19 Q Okay. 20 So is that when you were hired at Cred? 12:26:46 21 A That's right, yes. 22 Q So prior to Cred, you hadn't worked with any 23 companies that dealt in cryptocurrency? 24 A Can you be more specific? 25 Q I'm -- I'm not sure what the misunderstanding 12:27:04</p> <p style="text-align: right;">Page 19</p>	<p>1 either? 2 A I -- I don't recall. I would need to access 3 my résumé or -- or my -- my records. 4 Q Did you work at Goldman Sachs from 1990 to 5 1992? 12:28:24 6 A I was a -- I had an internship at Goldman 7 Sachs at -- I don't recall the dates, though. 8 Q Did you work at RBC Capital Markets from 1993 9 to 1996? 10 A I -- I don't recall. I -- I believe that 12:28:38 11 company was acquired. Isn't RBC -- wasn't that the 12 acquirer of a company that I worked at previously? 13 Q I'm not sure. I'm looking at your LinkedIn, 14 Mr. Alexander, that you -- that you control that's 15 on your Website. 12:28:58 16 A Often -- oftentimes, the companies are 17 acquired, so I can't confirm that. 18 Q Okay. 19 From January 2000 to January 2010, your 20 LinkedIn says you were a cofounder of Alternative 12:29:10 21 Capital Associates; is that correct? 22 A That is correct. 23 Q What does Alternative Capital Associates do? 24 A Financial services. 25 Q Okay. 12:29:23</p> <p style="text-align: right;">Page 21</p>

<p>1 Does Alternative Capital Associates do any 2 financial services that relate to cryptocurrency? 3 A No. 4 Q Okay. 5 Your next job was at Prosper Marketplace, 12:29:34 6 right? 7 A I believe -- I believe so. 8 Q Okay. 9 What did you do at Prosper Marketplace? 10 A I was involved in financial services. 12:29:48 11 Q Were the financial services that were 12 provided by Prosper Marketplace, did they have 13 anything to do with cryptocurrency? 14 A No. 15 Q Your next job was at The Lending Club, right? 12:30:03 16 A I don't recall. I -- I have had involvement 17 with Lending Club. I believe I was a consultant 18 there. 19 Q Okay. 20 You were then involved with Colchis Capital 12:30:16 21 Management, L.P. you were the head of business 22 development; is that right? 23 A That's right. 24 Q Did Colchis Capital Management, L.P. have 25 anything to do with cryptocurrency? 12:30:31 Page 22</p>	<p>1 that. 2 Q Look, I'm just asking if you worked there. 3 Did you work there from January to -- 2015 to 4 August 2018? 5 A I don't recall. 12:31:33 6 Q What does A Capital A do? 7 A Financial services. 8 Q Do the financial services provided by A 9 Capital A have anything to do with cryptocurrency? 10 A No. 12:31:49 11 Q Okay. 12 What did you do after you left A Capital A in 13 August 2018? 14 A I was hired by Libra Credit. Also by Cyber 15 Quant PTE. 12:32:06 16 Q Okay. 17 Let's talk about Cyber Quant. What's Cyber 18 Quant? 19 A Cyber Quant is an affiliate of Libra Credit, 20 a Singapore incorporated company affiliated -- yeah, 12:32:18 21 affiliated to Libra Credit. 22 Q What was your title at Cyber Quant? 23 A I don't recall. 24 Q What were your job responsibilities at Cyber 25 Quant? 12:32:41 Page 24</p>
<p>1 A Not to my knowledge, no. 2 Q You then worked at CircleUp from July 2013 to 3 January 2015, right? 4 A That's correct. 5 Q Did CircleUp have anything to do with 12:30:40 6 cryptocurrency? 7 A Not to my knowledge. 8 Q Okay. 9 You then worked at Direct Lending 10 Investments, L.L.C. from February 2016 to 12:30:48 11 October 2016, right? 12 A That's correct, yes. 13 Q Did that company have anything to do with 14 cryptocurrency? 15 A Not to my knowledge. 12:30:56 16 Q Okay. You then worked at A Capital A. You 17 were a partner there from January 2015 to 18 August 2018; is that right? 19 A I don't recall. 20 Q You were a partner less than three years ago, 12:31:09 21 and you don't recall if you worked there? 22 A I think that's the same company you were 23 referencing before. If you are going off my 24 LinkedIn, I don't know how it's chronologically 25 stacked, so I -- I can't confirm the exact dates of 12:31:24 Page 23</p>	<p>1 A I -- I don't -- I don't recall. 2 Q This is a job that you held as recently as 3 2020, right? 4 A Yeah. These -- these were affiliated 5 companies to what eventually became Cred, so there 12:32:55 6 was some legal reason for my affiliation with Cyber 7 Quantum, but I don't recall what it was. That's why 8 I can't -- I can't answer questions. 9 Because I don't know what the legal reason 10 was for Cyber Quantum's existence and how it was 12:33:14 11 affiliated with Libra Credit, which eventually 12 became Cred. So that's -- that's the -- that's the 13 confusion, I think. 14 Q So you mentioned three entities; Libra 15 Credit. Quant -- Quanta, Quant. What was -- what 12:33:28 16 was at Quant? 17 A Cyber Quantum. 18 Q Okay. And what was the third? 19 A Which is a Singapore entity. And Libra 20 Credit, which was the predecessor company to Cred 12:33:42 21 LLC. 22 Q And you mentioned a third entity. What was 23 that third entity? 24 A I -- I don't know. Those are the entities I 25 recall mentioning. 12:33:57 Page 25</p>

7 (Pages 22 - 25)

<p>1 Q Which ones?</p> <p>2 A So you want to start over?</p> <p>3 There's -- there's Libra Credit, which was a</p> <p>4 former company or was precursor company to Cred LLC.</p> <p>5 And then there was Cyber Quantum, which is a 12:34:14</p> <p>6 Singapore company. So maybe the confusion is in</p> <p>7 that PTE at the end, which I understand is a</p> <p>8 designation for -- local designation Singapore.</p> <p>9 Maybe that's the confusion.</p> <p>10 I -- I -- I believe I mentioned two entities. 12:34:30</p> <p>11 And the third being an entity Cred LLC that became</p> <p>12 Cred LLC from Libra Credit.</p> <p>13 Q When you were hired by Cred LLC, what was</p> <p>14 your job title?</p> <p>15 A I don't recall. 12:34:49</p> <p>16 Q You don't recall your job title at Cred?</p> <p>17 A No, I don't. That was from 2018, right?</p> <p>18 Q You were hired in August of 2018. You don't</p> <p>19 recall what was your title was?</p> <p>20 A I -- I don't -- I don't know exactly what it 12:35:11</p> <p>21 was. I would have to check back.</p> <p>22 Q Were you the chief capital officer of Cred?</p> <p>23 A I -- I was eventually, yes. My title became</p> <p>24 chief capital officer of Cred. I don't -- I don't</p> <p>25 know if that -- I don't recall if that changed 12:35:30</p> <p style="text-align: right;">Page 26</p>	<p>1 Q What does financial services mean?</p> <p>2 A A provision of financial services.</p> <p>3 Q James, were you in charge of cryptocurrency</p> <p>4 trading?</p> <p>5 A Sorry. Can you repeat the question, please? 12:36:52</p> <p>6 Q Did you have any involvement in</p> <p>7 cryptocurrency trading at Cred?</p> <p>8 A What do you mean by "involvement"?</p> <p>9 Q James, can you answer the question? What was</p> <p>10 your job at Cred? What did you do? It's not a 12:37:14</p> <p>11 difficult question. This is not a trick. What was</p> <p>12 your job at Cred? What were you -- what did you</p> <p>13 have to do every day?</p> <p>14 A I provided financial services.</p> <p>15 Q That's not an answer, James. 12:37:24</p> <p>16 A That's the best answer I can give you based</p> <p>17 on the question.</p> <p>18 Q Okay.</p> <p>19 At Cred, what was your involvement with</p> <p>20 cryptocurrency? 12:37:36</p> <p>21 A Cred, the nature of Cred's business included</p> <p>22 cryptocurrency.</p> <p>23 Q And what were your responsibilities?</p> <p>24 A My responsibilities at Cred?</p> <p>25 Q Yes. 12:37:48</p> <p style="text-align: right;">Page 28</p>
<p>1 during my tenure there.</p> <p>2 Q And what were your duties and</p> <p>3 responsibilities at Cred?</p> <p>4 A Can you be more specific?</p> <p>5 Q What was your job at Cred? 12:35:40</p> <p>6 A Eventually, chief capital officer.</p> <p>7 Q As chief capital officer, what did you have</p> <p>8 to do?</p> <p>9 A Financial services.</p> <p>10 Q What were your day-to-day responsibilities? 12:35:54</p> <p>11 A Financial services.</p> <p>12 Q What does financial services mean to you in</p> <p>13 the context of your job at Cred?</p> <p>14 A Providing financial services.</p> <p>15 Q James, what were your responsibilities at 12:36:13</p> <p>16 Cred?</p> <p>17 A Financial services, quite broadly. That</p> <p>18 was -- that's my best answer. Unless you can</p> <p>19 clarify more specifically. It's -- I --</p> <p>20 (Speaking simultaneously.) 12:36:27</p> <p>21 BY MR. EVANS:</p> <p>22 Q James, this was your job. What did you do</p> <p>23 every day?</p> <p>24 A It was a -- a broad agreement to provide</p> <p>25 financial services, as I've said. 12:36:38</p> <p style="text-align: right;">Page 27</p>	<p>1 A Chief capital officer.</p> <p>2 Q That was your role.</p> <p>3 What were your responsibilities as chief</p> <p>4 capital officer?</p> <p>5 A Providing financial services. 12:38:01</p> <p>6 Q What were those financial services that you</p> <p>7 were providing?</p> <p>8 A Providing financial services.</p> <p>9 Q Is that your complete answer, James?</p> <p>10 A Yes. 12:38:25</p> <p>11 Q You understand you are here under a Court</p> <p>12 order, right? You understand that?</p> <p>13 A Yes.</p> <p>14 Q And there was an emergency application</p> <p>15 brought and a Court order issued based on the fact 12:38:30</p> <p>16 that millions of dollars of cryptocurrency were</p> <p>17 moved by you on January 16th and January 17th, and</p> <p>18 that's why we're here.</p> <p>19 Do you understand that?</p> <p>20 MR. GRIVNER: And I'm going to note for the 12:38:40</p> <p>21 record that what -- we are here today to discuss, as</p> <p>22 Judge Dorsey ordered, a deposition regarding those</p> <p>23 transfers.</p> <p>24 And I'll certainly allow background</p> <p>25 questions, but we want to limit -- the -- the -- the 12:38:53</p> <p style="text-align: right;">Page 29</p>

<p>1 scope of today's deposition is limited to those 2 transfers -- assets that were transferred from Cred 3 Capital at that time. 4 You can certainly answer these questions, but 5 at some point in time, we have to focus on the -- 12:39:08 6 the issues which Judge Dorsey ordered us -- this 7 deposition to -- to relate to today. 8 MR. EVANS: Geoffrey, the -- the Court 9 ordered the deposition based on the transfers that 10 Alexander made, all his personal assets, everything 12:39:24 11 he did at Cred, all -- everything in relation to the 12 transfers that he made at Cred. 13 I mean, the Court says it's time for 14 Mr. Alexander to start answering some difficult 15 questions and do so in a way that gives the parties 12:39:35 16 and the Court the ability to understand what's going 17 on here. 18 And I asked Mr. Alexander, "What was your job 19 at Cred?" He says, "financial services," and 20 refuses to answer. 12:39:47 21 Okay? 22 MR. GRIVNER: And -- and I'm -- I'm 23 instructing him to answer that question to the best 24 of his ability. 25 MR. EVANS: Thank you. 12:39:53</p> <p style="text-align: right;">Page 30</p>	<p>1 A No. I am saying that I provided financial 2 services, and that to answer your question, we need 3 to reference the job description in my employment 4 agreement. 5 Q I'm asking you for your recollection, James. 12:41:09 6 You worked there for two years. What were your job 7 responsibilities at Cred? 8 A I -- I can't provide you with a more precise 9 answer from what I've provided. 10 MR. EVANS: Can we go off the record for a 12:41:21 11 second? 12 COURT REPORTER: All counsel in agreement? 13 MR. GRIVNER: Yes. 14 MR. LUFT: Sure. 15 THE VIDEOGRAPHER: Stand by, please. This 12:41:33 16 marks the end of Media No. 3. Going off the record 17 at 12:41 p.m. Pacific. 18 (Recess.) 19 THE VIDEOGRAPHER: We are back on the record 20 at 12:48 p.m. Pacific, and this marks the beginning 12:48:31 21 of Media No. 4 in the deposition of James Alexander. 22 You may proceed, Counsel. 23 BY MR. EVANS: 24 Q Mr. Alexander, what were your job 25 responsibilities at Cred? 12:48:43</p> <p style="text-align: right;">Page 32</p>
<p>1 BY MR. EVANS: 2 Q Mr Alexander, let's try it again. 3 What was your job -- 4 A The only way to answer that question is by 5 having access to my employment agreement, which 12:39:58 6 has -- should have an attachment discussing my job 7 description. I don't have access to that. 8 Q James, you worked at Cred for two years. You 9 transferred millions of dollars of cryptocurrency 10 from Cred. You were involved with trading and 12:40:13 11 strategy and hedging, and you were on the investment 12 committee, and we all know this. It's not a secret. 13 So just answer the question. What were your 14 job responsibilities at Cred? 15 A I can't answer that without having my job 12:40:27 16 description in front of me. I don't have access to 17 it. You have access to those records. I -- if you 18 could provide the employment agreement with the job 19 description, I would be happy to review it to 20 confirm or add any detail to what my exact role 12:40:40 21 and -- and day-to-day functions were. 22 Q Okay. So, James, your testimony today is 23 that for two years you worked at Cred, but you 24 cannot remember a single thing that you did at Cred? 25 Is that what you are saying? 12:40:55</p> <p style="text-align: right;">Page 31</p>	<p>1 A You know, I -- while we were off the record, 2 I was able to pull up some documents which, you 3 know, this is -- we need to have access to a 4 substantial amount of documents to -- for me to 5 accurately answer your questions, which -- which I 12:48:58 6 want to do, but I need to have access to the 7 documents. 8 So I have a copy of my original advisory 9 agreement here. So to clarify my relationship with 10 Cyber Quantum PTE, Limited -- so I'll spell that 12:49:10 11 out. It's C-y-b-e-r. Next word Quantum, 12 Q-u-a-n-t-u-m. Next word PTE, period. LTD period. 13 So it would appear I was a consultant to 14 Cyber Quantum PTE Limited starting on the 7th of 15 July 2018, which eventually led to my employment 12:49:36 16 with Libra Credit thereafter. 17 So in this advisory agreement, there's a very 18 specific description of my role, and I can review 19 those. I'm not sure what the best way to do that 20 is. To just talk through them or provide you with 12:49:58 21 the agreements? 22 Q I just want to know what your role was at 23 each of these companies, what were your daily 24 responsibilities? 25 A So -- and -- and to answer your question, my 12:50:11</p> <p style="text-align: right;">Page 33</p>

<p>1 role at Cyber Quantum was effectively the same as 2 the role at Cred. So these -- these lists of 3 descriptions that I'm going to provide you right now 4 of my role is substantively the same as it was at 5 Cred. 12:50:32 6 So I hope you understand I'm endeavoring to 7 answer your questions, but I need to answer them 8 accurately, and for that, I will need access to 9 documents. 10 So I'll start with what my job description 12:50:42 11 was at Cyber Quant PTE, and we can go from there, if 12 that makes sense. 13 Q I just want your recollection, James. I want 14 your recollection of what your job responsibilities 15 were at Cred. 12:50:59 16 A Sure. 17 Q And what your scope of job responsibilities 18 were at Cyber Quantum. That's what I'm asking. 19 A So No. 1 was to obtain and structure credit 20 facilities for the company. Leveraging our 12:51:05 21 advisors' network of contacts. 22 The second activity was to actively work with 23 the executive team to formulate an overall credit 24 and funding strategy to the company. 25 Third was to assist the company in finding 12:51:21 Page 34</p>	<p>1 asset management services. 2 Q And what was your responsibility at Cred 3 Capital? 4 A I was the president and sole director. 5 Q Okay. What were you in charge of? 12:53:12 6 A What was I in charge of. 7 I -- I can provide you with my title, but is 8 that not sufficient? Are we going to go into one of 9 these circular discussions again? 10 Q Well, I hope not. 12:53:31 11 What did you have to do every day at Cred 12 Capital? 13 A I -- I need to reference my employment 14 agreement and my job description in order to do 15 that. I don't immediately have that access, you 12:53:42 16 know, to hand. 17 Q Okay. 18 Let -- let -- let's do it this way. What was 19 Cred Capital's business activities from January to 20 March of 2020? 12:53:52 21 A Sorry. January to March -- 22 Q Yep. 23 A -- of 2020 what were Cred Capital's? 24 Q Correct. 25 A What were Cred Capital's. 12:54:06 Page 36</p>
<p>1 additional potential team members and employees 2 for -- from amongst my network of contacts who could 3 promote the company's business and/or interests. 4 No. 4, assist the company in finding 5 suppliers, customers, strategic partners, and key 12:51:40 6 industry contacts amongst my network of contacts to 7 provide the company business and -- to promote the 8 company's business or interest. 9 Lastly, it was to provide reasonable and time 10 in response to queries by the company's directors, 12:51:58 11 officers, employees on matters that -- that I'm 12 knowledgeable about. 13 Q Did there come a time when you worked for a 14 company called Cred Capital? 15 A Cred Capital. Yes. 12:52:09 16 Q When was that? 17 A Began full-time employment at Cred Capital on 18 June 1st. And prior to that, from the March or 19 April time frame, I had functional responsibilities 20 that were formalized on June 1st of 2020. 12:52:32 21 Q What was Cred Capital? 22 A Can you repeat the question? 23 Q What was Cred Capital? 24 A Cred Capital was an independently established 25 company intended to pursue financial services and 12:52:53 Page 35</p>	<p>1 Can you just repeat the question, please. 2 Q What were the business activities of Cred 3 Capital from January 2020 to March 2020? 4 A I don't believe Cred Capital had any business 5 operations during that quarter. 12:54:19 6 Q Okay. So when did Cred Capital begin 7 business operations? 8 A The second quarter of 2020. 9 Q Okay. And what about the third quarter of 10 2020? Did Cred Capital have any business 12:54:32 11 operations? 12 A From -- starting the third quarter of last 13 year, I pursued the business activities of Cred 14 Capital under the presumption I was the sole 15 director of Cred Capital, which I maintain I 12:54:55 16 continued to be. 17 Q All right. So let's talk about June 2020. 18 What business activities were you pursuing in June 19 of 2020? 20 A Sorry, guys. I'm -- I'm suffering from poor 12:55:05 21 health. I'm recovering from COVID. I -- I need to 22 take periodic breaks. So if I could ask for a -- 23 a -- a logical break point that we could take a -- a 24 short break. 25 Q When do you need a break, Mr. Alexander? 12:55:29 Page 37</p>

<p>1 A As soon as possible. I'm feeling -- I'm 2 feeling unwell. 3 MR. WALSH: How much time do you need? 4 THE DEPONENT: Could you give me ten minutes? 5 MR. WALSH: Of course, no problem. Hope you 12:55:50 6 feel better. We'll see you in ten minutes. 7 THE DEPONENT: Okay. 8 THE VIDEOGRAPHER: I'm going to go off the 9 record, Mr. Alexander. Please hold. 10 This marks the end of Media No. 4. Going off 12:55:55 11 the record at 12:56 p.m. Pacific. 12 (Recess.) 13 THE VIDEOGRAPHER: Stand by, please. 14 We are back on the record at 1:07 p.m. 15 Pacific. This marks the beginning of Media No. 5 in 01:07:25 16 the deposition of James Alexander. 17 You may proceed, Counsel. 18 BY MR. EVANS: 19 Q Mr. Alexander, we're going to jump ahead a 20 little bit. 01:07:38 21 Do you recall attending a hearing in the 22 bankruptcy court on Wednesday? 23 A Joe, before you get started, I can't find my 24 medication for some reason, so maybe we could just 25 plan for 45 minutes for break. 01:07:50</p> <p style="text-align: right;">Page 38</p>	<p>1 lawyer, and this is my first legal process of this 2 nature, so I -- it -- it doesn't -- didn't mean 3 anything to me. 4 Q Did you ever see a copy of the motion papers 5 filed by the committee asking for emergency relief 01:09:14 6 because of cryptocurrency transactions you executed? 7 A Sorry. Can you repeat that question? 8 Q Did you ever see a motion filed by the 9 committee seeking emergency relief based on 10 cryptocurrency transactions that you executed? 01:09:34 11 A I don't know. There's been so many legal 12 filings going back and forth. I -- there is a lot 13 of technical terms in there that I have no 14 competency or ability to answer. 15 I have literally gotten hundreds of e-mails 01:09:52 16 since this -- since this Wednesday hearing. Not a 17 lot of it means much to me. I'm trying to sift 18 through it. I'm trying to sift through it with 19 counsel. But that's the best answer I can give you. 20 Q You understand there was a motion that was 01:10:07 21 made about you on February 3rd, right? 22 A It was a motion -- no, I don't know that. 23 Q Okay. 24 You provided through your counsel copies of a 25 Wells Fargo bank account. 01:10:26</p> <p style="text-align: right;">Page 40</p>
<p>1 Is that agreeable to everyone? 2 Q You want to take a break at 4:52 is what 3 you're saying? 4 A Approximately every 45, minutes. If I'm 5 feeling any -- if I'm feeling unwell, I'll -- 01:08:06 6 I'll -- I'll raise my hand, but that's fine. Just 7 for your sort of flow. That would be helpful. 8 Q No. I appreciate that, and that's fine. So 9 let's -- let's say we'll take a break in 45 minutes 10 at 4:53. 01:08:20 11 Okay? 12 So on February 3rd, 2021, you attended a 13 bankruptcy court hearing via Zoom. 14 Do you remember that? 15 A Yes. 01:08:33 16 Q And during that hearing, Counsel for the 17 Committee indicated there would be an emergency 18 motion concerning two transactions by you. 19 Do you remember that? 20 A No, I don't recall that. 01:08:45 21 Q Do you recall that during that bankruptcy 22 court hearing that an emergency motion will be made 23 about you? 24 A I remember reference to that, but I'm -- I -- 25 I have no idea what it means. I'm -- I'm not a 01:09:01</p> <p style="text-align: right;">Page 39</p>	<p>1 Do you recall that? 2 A Yes. 3 Q Okay. 4 And you maintained a Wells Fargo bank 5 account, and you said it was for Cred Capital; is 01:10:33 6 that right? 7 A Well, I -- I maintain bank accounts at Wells 8 Fargo for James Alexander d/b/a James Alexander 9 Cred. 10 Q Okay. 01:10:48 11 Maybe you can explain that to me. Does this 12 bank account hold Cred Capital assets? 13 A I -- I can't explain that to you because I 14 don't have the ability to determine whether these 15 are Cred Capital accounts or personal accounts. 01:11:01 16 Q Uh-huh. 17 A I maintain these accounts as James Alexander 18 d/b/a James Alexander Cred. I think we need to make 19 a determination here, but I -- I can't -- I can't 20 make that determination. 01:11:18 21 MR. EVANS: Mr. Ashworth, can you please 22 share the February account details for the Wells 23 Fargo account as produced by Mr. Alexander, Account 24 No. 9285? 25 ///</p> <p style="text-align: right;">Page 41</p>

<p>1 (Exhibit A was marked for 2 identification and is attached 3 hereto.) 4 BY MR. EVANS: 5 Q Mr. Alexander, this is a bank account that 01:11:36 6 you produced through your counsel, and the date on 7 the top is February 7th, 2021. 8 MR. EVANS: Mr. Ashworth, if you would please 9 scroll down to the next page. 10 You could stop there. 01:11:49 11 BY MR. EVANS: 12 Q On February 4th, 2021, the day after the 13 bankruptcy court hearing you attended, you 14 transferred to Alexander Custom Management \$100,000. 15 Do you see that? 01:12:02 16 A I do. 17 Q Do you intend on returning that \$100,000 to 18 the debtors? 19 A What does that mean, returning to debtors? 20 Q Will you return the money, Mr. Alexander? 01:12:18 21 A To -- to whom? 22 Q To the debtors, to Cred, to the persons that 23 you took it from. 24 A Well, if -- I can't answer that. I... 25 Q It's a -- it's a simple question. The 01:12:32</p> <p style="text-align: right;">Page 42</p>	<p>1 Do you see that? 2 A So to clarify those dates, that's the posted 3 date of the transaction. That's not the date the 4 transaction -- that's not the date of the 5 transaction. That's the date of the posting of the 01:13:46 6 transaction. 7 Q Uh-huh. 8 A And postings can take many days in -- in 9 financial services, so -- 10 Q Okay. 01:13:56 11 So let me make the question a little -- let 12 me make the question a little easier. 13 (Speaking simultaneously.) 14 A -- transaction date, please. 15 Q Okay. 01:14:01 16 A If you could -- 17 Q If you took -- 18 A If you could confirm that correction -- 19 COURT REPORTER: One at a time, please. 20 THE DEPONENT: If you could please confirm 01:14:13 21 that correction that these are the posted 22 transaction dates. 23 BY MR. EVANS: 24 Q You took \$60,000 in cash out of this account, 25 right? 01:14:21</p> <p style="text-align: right;">Page 44</p>
<p>1 \$100,000 that was in the account that is now in the 2 account apparently held by Alexander Custom 3 Management, are you going to provide that \$100,000 4 back to the debtor? 5 A I will rely on advice of counsel on what to 01:12:47 6 do for any steps at this stage. I -- I do not have 7 the legal competency to determine whether I should 8 or shouldn't be transferring funds. So I'm doing 9 nothing until I have advice from counsel. 10 Q Okay. 01:13:04 11 And you would -- you would admit that 12 Alexander Custom Management is an account that you 13 control, right? 14 A Can you be more specific? Is there an 15 account number or? 01:13:16 16 Q Sure. 17 There was \$100,000 transferred out of this 18 account on February 4th, 2021 to an account held by 19 Alexander Custom Management. 20 The account Alexander Custom Management is 01:13:24 21 owned and controlled by you, right? 22 A Yes. 23 Q Okay. 24 On February 4th, 2021, there was a cash 25 withdraw of \$60,000. 01:13:35</p> <p style="text-align: right;">Page 43</p>	<p>1 A Can you confirm that these are the posted 2 transaction dates? Because that's an -- that's an 3 error in my confirmation. 4 Q These are your documents, Mr. Alexander. You 5 provided them to us. 01:14:33 6 I'm asking you: Did take \$60,000 out of this 7 account? 8 A And I'm asking to confirm the -- the posted 9 transaction date is what you meant when you said 10 "transaction date." 01:14:45 11 MR. GRIVNER: James, I'm going to instruct 12 you to answer the question that's being asked. 13 Okay. 14 Go ahead, Joe. 15 BY MR. EVANS: 01:14:54 16 Q Did you withdraw \$60,000 in cash from this 17 account? 18 A Yes. 19 Q On which day did you withdraw \$60,000 from 20 this account? 01:15:03 21 A I don't recall. 22 Q Where is that money now? 23 A It's -- it's -- it's -- it's with me. 24 Q Okay. 25 Is it in your house? 01:15:14</p> <p style="text-align: right;">Page 45</p>

12 (Pages 42 - 45)

<p>1 A No.</p> <p>2 Q Where is it?</p> <p>3 A It's -- it's kept safe.</p> <p>4 Q Where is it kept safe?</p> <p>5 A It's kept -- it's kept safe just at a 01:15:20</p> <p>6 location that I will disclose after my counsel tells</p> <p>7 me to.</p> <p>8 MR. EVANS: Mr. Grivner?</p> <p>9 MR. GRIVNER: James, I will instruct you to</p> <p>10 answer that question where those funds currently 01:15:34</p> <p>11 reside.</p> <p>12 THE DEPONENT: Okay.</p> <p>13 Those are currently in my car.</p> <p>14 BY MR. EVANS:</p> <p>15 Q Where is your car? 01:15:42</p> <p>16 A My car is -- is parked at Finley Avenue.</p> <p>17 Q What's the full address?</p> <p>18 A 4501 Finley Avenue.</p> <p>19 Q What kind of car is it?</p> <p>20 A It's a Mercedes. 01:15:57</p> <p>21 Q When did you purchase that Mercedes?</p> <p>22 A 2014.</p> <p>23 Q Okay.</p> <p>24 Why did you withdraw \$60,000 in cash from</p> <p>25 this account? 01:16:08</p> <p style="text-align: right;">Page 46</p>	<p>1 Q Okay.</p> <p>2 The description says (as read):</p> <p>3 "Withdrawal made in a branch</p> <p>4 store."</p> <p>5 Do you see that? 01:17:16</p> <p>6 A Yeah. Unfortunately, you -- those notations</p> <p>7 all say withdrawal, but some, if not all, of those</p> <p>8 transactions are counter checks, which is just a</p> <p>9 cheaper way to transfer directly to Wells Fargo</p> <p>10 accounts. 01:17:34</p> <p>11 And those are payments to consultants, so I</p> <p>12 would have to get back to you to see exactly who</p> <p>13 that payment was to.</p> <p>14 Q Yeah. Well, this was just last week. So</p> <p>15 let -- let's talk about it now. 01:17:46</p> <p>16 Who was this \$10,000 for?</p> <p>17 A I don't recall. There were a variety of</p> <p>18 payments there. It was -- it was either --</p> <p>19 THE DEPONENT: Can you scroll down?</p> <p>20 MR. EVANS: Go ahead. 01:18:06</p> <p>21 THE DEPONENT: Yeah. I think that's my</p> <p>22 salary payment for -- for -- yeah, I think that's a</p> <p>23 salary payment to me.</p> <p>24 BY MR. EVANS:</p> <p>25 Q So your testimony is you took out \$10,000 in 01:18:26</p> <p style="text-align: right;">Page 48</p>
<p>1 A I -- to settle the tax liability that I have,</p> <p>2 which was part of 2020 compensation.</p> <p>3 Q Okay.</p> <p>4 So you were planning on paying the tax</p> <p>5 authorities in cash? 01:16:26</p> <p>6 A I was -- I was planning -- planning on paying</p> <p>7 the tax authorities, yes. I just don't know to whom</p> <p>8 that check has to be made or how to hand over those</p> <p>9 funds, so it seemed -- it seemed the -- the right</p> <p>10 thing to do. 01:16:38</p> <p>11 Q The right thing to do is to pull out \$60,000</p> <p>12 in cash?</p> <p>13 A For a tax liability, yes, that's...</p> <p>14 MR. GRIVNER: Object to form.</p> <p>15 BY MR. EVANS: 01:16:49</p> <p>16 Q Have you ever paid your taxes in cash before?</p> <p>17 A I have, yes, my -- my property taxes.</p> <p>18 Q Okay.</p> <p>19 MR. EVANS: If you scroll down, Mr. Ashworth,</p> <p>20 BY MR. EVANS: 01:16:55</p> <p>21 Q There's a withdrawal on February 3rd, 2021 of</p> <p>22 \$10,000.</p> <p>23 Do you see that, Mr. Alexander?</p> <p>24 A Yes, and I believe that's a counter check. I</p> <p>25 don't believe that's cash. 01:17:11</p> <p style="text-align: right;">Page 47</p>	<p>1 cash to pay yourself a salary?</p> <p>2 A Well, a counter check is where -- is a -- is</p> <p>3 a check. It's not -- it -- it shows as a withdrawal</p> <p>4 made in branch, but it's not physical cash. It's --</p> <p>5 it's a -- it's a -- it's a check. It's a counter 01:18:43</p> <p>6 check.</p> <p>7 Q Okay.</p> <p>8 MR. EVANS: Can you scroll up, Mr. Ashworth,</p> <p>9 please?</p> <p>10 BY MR. EVANS: 01:18:49</p> <p>11 Q Okay.</p> <p>12 So the \$100,000 that was transferred on</p> <p>13 February 4th, the \$60,000 that was withdrawn in cash</p> <p>14 on February 4th, and the \$10,000 that was withdrawn</p> <p>15 that you say was a check written to yourself, will 01:19:03</p> <p>16 you return that to the debtor?</p> <p>17 A I'll have to take counsel on that. I can't</p> <p>18 answer.</p> <p>19 Q Okay.</p> <p>20 The \$10,000 that you say was a cashier's 01:19:13</p> <p>21 check, where is that money now?</p> <p>22 A That should have been deposited. I'll have</p> <p>23 to -- I'll have to confirm that.</p> <p>24 Q Where did you deposit it?</p> <p>25 A I would deposit it in a personal account, 01:19:34</p> <p style="text-align: right;">Page 49</p>

<p>1 so...</p> <p>2 Q Okay.</p> <p>3 In what personal account?</p> <p>4 A I don't know. I will -- I will have to get</p> <p>5 back to you. Well, it would be my personal account, 01:19:40</p> <p>6 so I -- I can answer that. It would be my personal</p> <p>7 account.</p> <p>8 Q Okay.</p> <p>9 MR. EVANS: Scroll up, Sam, please.</p> <p>10 Scroll down. 01:19:52</p> <p>11 BY MR. EVANS:</p> <p>12 Q The \$60,000 that's sitting in your car --</p> <p>13 MR. GRIVNER: Is there a question pending?</p> <p>14 I'm sorry. I'm just a little bit lost.</p> <p>15 MR. ASHWORTH: This is Sam Ashworth of 01:21:42</p> <p>16 McDermott, Will & Emery for the Committee. Joe just</p> <p>17 got kicked off. I guess the server kicked him off.</p> <p>18 He should be back. I see him now.</p> <p>19 MR. GRIVNER: Got it.</p> <p>20 MR. EVANS: I think I'm back. Sorry about 01:21:53</p> <p>21 that.</p> <p>22 Can everybody hear me?</p> <p>23 MR. ASHWORTH: Joe, we lost you just at the</p> <p>24 \$60,000 that's in your car.</p> <p>25 MR. EVANS: Okay. 01:22:06</p> <p style="text-align: right;">Page 50</p>	<p>1 So let me get this straight. You're going to</p> <p>2 take the \$60,000 in cash out of the Cred Capital</p> <p>3 bank account, you put that \$60,000 in cash, you put</p> <p>4 it in the trunk of your car. You are then going to</p> <p>5 get in your car, drive to the bank, and put the 01:23:24</p> <p>6 \$60,000 in cash in your personal account,</p> <p>7 (unintelligible) cash moneys?</p> <p>8 A No. The intention was always to deposit that</p> <p>9 cash into my account, similar to the way I do with</p> <p>10 counter checks, but I meant to do it the same day, 01:23:35</p> <p>11 and it just didn't happen.</p> <p>12 So I -- my intention is to deposit that</p> <p>13 money, to whomever any cash is due, I -- I'm -- I</p> <p>14 want to provide that cash, so -- but I'm -- I'm --</p> <p>15 I'm lost now in terms of where we stand in this 01:23:54</p> <p>16 legal process, so I really need to rely on counsel,</p> <p>17 and I -- I -- I haven't been able to speak with</p> <p>18 them. I haven't been able to consult with them</p> <p>19 since I've been buried in legal documents, frankly,</p> <p>20 that I've been producing, and so -- 01:24:09</p> <p>21 Q Maybe I -- maybe I can help you. This</p> <p>22 account was a Cred Capital bank account. The funds</p> <p>23 in this account that were remaining have been</p> <p>24 transferred to the debtors because it's a Cred</p> <p>25 Capital bank account. The \$60,000 in cash that is 01:24:22</p> <p style="text-align: right;">Page 52</p>
<p>1 Are we -- are we still on the record?</p> <p>2 COURT REPORTER: Yes.</p> <p>3 BY MR. EVANS:</p> <p>4 Q The question is, the \$60,000 that's in your</p> <p>5 car, will you drive that to your lawyer's office so 01:22:18</p> <p>6 that your lawyer can provide it to the debtor?</p> <p>7 A No. It's my intention to deposit that cash</p> <p>8 to my personal account today.</p> <p>9 Q So your intention is to take the \$60,000 in</p> <p>10 cash and to put it in your personal account, right? 01:22:37</p> <p>11 A It is, where it will be available to -- if --</p> <p>12 upon instruction, I can transfer it. It's a little</p> <p>13 to cumbersome to -- to work with cash or -- or -- or</p> <p>14 checks for that matter.</p> <p>15 Q Yeah, I would agree. 01:22:50</p> <p>16 So the \$60,000 in cash that you took out of</p> <p>17 the Cred Capital bank account needs to be returned</p> <p>18 to the debtors immediately.</p> <p>19 Will you return the \$60,000 in cash to the</p> <p>20 debtors? 01:23:00</p> <p>21 A I will be depositing that in my personal</p> <p>22 account as soon as possible, which I intended to do</p> <p>23 several days ago, but I -- I haven't been able</p> <p>24 to -- to get to the bank.</p> <p>25 Q Okay. 01:23:11</p> <p style="text-align: right;">Page 51</p>	<p>1 currently in the trunk of your car, those are the</p> <p>2 debtors assets, and they need to be returned</p> <p>3 immediately.</p> <p>4 A No. Those are liabilities that were owed to</p> <p>5 me, and so they're -- whatever the timing was and 01:24:36</p> <p>6 whatever form I took those out, I believed as a sole</p> <p>7 director, as I continue to believe, that I am owed</p> <p>8 that compensation for tax liabilities and salary.</p> <p>9 And if I want to take them out in pennies, I can</p> <p>10 take them out in pennies. And so that is my 01:24:54</p> <p>11 position.</p> <p>12 Q What work did you do for Cred Capital in</p> <p>13 January of 2020?</p> <p>14 A I was the sole director of Cred Capital in</p> <p>15 January 2020. 01:25:12</p> <p>16 Q What did you do every day? What was your</p> <p>17 job?</p> <p>18 A Financial services.</p> <p>19 Q Uh-huh.</p> <p>20 You're aware that Cred Capital filed for 01:25:15</p> <p>21 bankruptcy in November, right?</p> <p>22 A I'm not sure of the exact date.</p> <p>23 Q Okay.</p> <p>24 So you're aware that in January of 2020, Cred</p> <p>25 Capital had already filed for bankruptcy, right? 01:25:26</p> <p style="text-align: right;">Page 53</p>

<p>1 A There was a filing that occurred.</p> <p>2 UNIDENTIFIED SPEAKER: I think you mean '21,</p> <p>3 right, 2021?</p> <p>4 MR. EVANS: Yes, James. Thank you.</p> <p>5 THE DEPONENT: Can you repeat the question? 01:25:44</p> <p>6 BY MR. EVANS:</p> <p>7 Q You're aware that as of January 2021, Cred</p> <p>8 Capital had already filed for bankruptcy, right?</p> <p>9 A Well, I contend, as I continue to contend,</p> <p>10 that I'm the sole director of Cred Capital. I -- I 01:25:55</p> <p>11 believe, and this is my layman legal expertise --</p> <p>12 that there has been a judgment as of last Wednesday.</p> <p>13 But that's as much as I know.</p> <p>14 Q Okay.</p> <p>15 So just -- just so I get a clear answer. The 01:26:11</p> <p>16 \$170,000 that was transferred either to your</p> <p>17 account, to cash that's held in your car, or the</p> <p>18 \$10,000 in a check, you're not going to return that</p> <p>19 back to us today, right?</p> <p>20 A I'm taking advice from counsel on that to -- 01:26:24</p> <p>21 as to where the assets should be sent or if I was</p> <p>22 legitimately entitled to that compensation, so...</p> <p>23 Q Uh-huh.</p> <p>24 A And I will act accordingly. I will follow</p> <p>25 instructions. And that money will be deposited and 01:26:44</p> <p style="text-align: right;">Page 54</p>	<p>1 of your car?</p> <p>2 A I -- I -- I don't know exactly. I -- I don't</p> <p>3 know. I don't know.</p> <p>4 Q So -- so -- so you spent some of it?</p> <p>5 A I -- I don't know. I can't answer that. 01:27:59</p> <p>6 I -- I would have to -- have to defer that question.</p> <p>7 Apologies.</p> <p>8 Q Okay.</p> <p>9 You took \$60,000 out in cash a week ago, you</p> <p>10 say it's in the trunk of your car, and now you can't 01:28:09</p> <p>11 tell me how much of the 60,000 is still in the trunk</p> <p>12 of your car? Is that your answer?</p> <p>13 A Yes. I'm sorry. I -- I need to deposit it,</p> <p>14 and then I'll give you the exact number of</p> <p>15 what's -- what's -- when the deposit is made. 01:28:21</p> <p>16 Q Did you spend any of it, James? Did you</p> <p>17 spend any of it?</p> <p>18 A I don't recall. Cash -- cash is fungible.</p> <p>19 I -- I don't recall.</p> <p>20 MR. EVANS: Can you scroll down, Sam? 01:28:37</p> <p>21 Can you stop on January 28th, 2021?</p> <p>22 BY MR. EVANS:</p> <p>23 A On January 28th, 2021, there's a \$350,000</p> <p>24 transaction to Quinn Emanuel.</p> <p>25 Q What's that for? 01:28:56</p> <p style="text-align: right;">Page 56</p>
<p>1 available in current accounts, so that is my --</p> <p>2 Q Let me ask -- let me ask you this: If you</p> <p>3 were going to send that \$60,000 in cash to a</p> <p>4 personal bank account, couldn't you have wired that</p> <p>5 money to another account, as opposed to pulling it 01:27:03</p> <p>6 out in cash?</p> <p>7 A Was it cash or a counter check, though, that</p> <p>8 we're talking about?</p> <p>9 Q Your bank records?</p> <p>10 (Speaking simultaneously.) 01:27:15</p> <p>11 THE DEPONENT: (Unintelligible.)</p> <p>12 BY MR. EVANS:</p> <p>13 Q Your bank records say (as read):</p> <p>14 "Withdrawal made in a branch</p> <p>15 store: \$60,000." 01:27:20</p> <p>16 A Yes.</p> <p>17 Q Okay.</p> <p>18 You could have executed an account transfer,</p> <p>19 right, of \$60,000 to your personal account, couldn't</p> <p>20 you? 01:27:35</p> <p>21 A Yes. Yes, I could have.</p> <p>22 Q Let me ask you this, then we will -- then we</p> <p>23 will move on.</p> <p>24 Of the \$60,000 that you pulled out from this</p> <p>25 bank account, how much of that is still in the trunk 01:27:42</p> <p style="text-align: right;">Page 55</p>	<p>1 A I believe that's privileged, that -- that</p> <p>2 entry.</p> <p>3 Q No. Payments to law firms are not</p> <p>4 privileged, so what's that transaction for?</p> <p>5 A It was for legal services. 01:29:06</p> <p>6 Q Whose legal services?</p> <p>7 A That's for Dan Wheeler's legal services.</p> <p>8 Q Why are you paying for Dan Wheeler's legal</p> <p>9 services?</p> <p>10 A He's -- he asked me to indemnify him, which I 01:29:23</p> <p>11 did, and so he asked me to make that payment, which</p> <p>12 I did.</p> <p>13 Q You filed a motion to dismiss the bankruptcy</p> <p>14 case.</p> <p>15 Do you recall that? 01:29:36</p> <p>16 A Yes.</p> <p>17 Q And on January 21st, 2021, Mr. Wheeler</p> <p>18 submitted a declaration in support of your</p> <p>19 application to dismiss the bankruptcy case.</p> <p>20 Do you remember that? 01:29:53</p> <p>21 A I do not.</p> <p>22 Q Okay.</p> <p>23 Are you aware that Mr. Wheeler submitted a</p> <p>24 declaration in support of your bankruptcy -- of your</p> <p>25 motion to dismiss the bankruptcy cases? 01:30:00</p> <p style="text-align: right;">Page 57</p>

<p>1 A Yes.</p> <p>2 Q Okay.</p> <p>3 And one week afterwards, you wire \$350,000 to</p> <p>4 Quinn Emanuel for his legal defense, right?</p> <p>5 A Yes. 01:30:14</p> <p>6 Q Okay.</p> <p>7 When is the last time you spoke to</p> <p>8 Mr. Wheeler?</p> <p>9 A I don't recall. It was around the 27th</p> <p>10 of -- 27th of January. 01:30:32</p> <p>11 Q Okay.</p> <p>12 And what did you talk about?</p> <p>13 A We talked about his -- we talked about his</p> <p>14 indemnification and a lawyer that he had chosen.</p> <p>15 Q Okay. 01:30:49</p> <p>16 And what lawyer was that?</p> <p>17 A Quinn Emanuel.</p> <p>18 Q And he asked you to wire \$350,000?</p> <p>19 A Yes.</p> <p>20 Q Okay. 01:31:01</p> <p>21 Had he asked you previously to wire \$350,000?</p> <p>22 A Previous to what?</p> <p>23 Q To the conversation on January 27th, 2021.</p> <p>24 A Can you -- can you repeat the question?</p> <p>25 Q Sure. Let me rephrase. 01:31:15</p> <p style="text-align: right;">Page 58</p>	<p>1 I have to pull it -- I'll have to do the search for</p> <p>2 it.</p> <p>3 Q So can you send that to us tonight?</p> <p>4 A I guess I would defer that question to Jeff</p> <p>5 Grivner, if he's available. 01:32:42</p> <p>6 I can send it to my lawyer. I can send it to</p> <p>7 my counsel.</p> <p>8 Q Okay. Okay. All right.</p> <p>9 Did you pay for anybody else's lawyers?</p> <p>10 A Can you be more specific? 01:32:56</p> <p>11 Q Have you paid for anyone's lawyers who</p> <p>12 previously worked at Cred or Cred Capital?</p> <p>13 A In the context?</p> <p>14 Q In any context.</p> <p>15 A Ask -- sorry. Can you ask the question one 01:33:17</p> <p>16 more time? Have I paid for anyone's lawyer in?</p> <p>17 Q For any -- anyone that worked at Cred or Cred</p> <p>18 Capital, have you paid for their lawyers, other than</p> <p>19 Dan Wheeler?</p> <p>20 A No. No. 01:33:40</p> <p>21 Q Okay.</p> <p>22 And --</p> <p>23 A Other than -- other than Wheeler, right?</p> <p>24 Q Other than Wheeler, right.</p> <p>25 A That's -- that's right. 01:33:50</p> <p style="text-align: right;">Page 60</p>
<p>1 When was the first time Wheeler asked you to</p> <p>2 pay for his lawyers?</p> <p>3 A I'll have to look back on the exact date. It</p> <p>4 was -- he asked me to provide him with an</p> <p>5 indemnification, and I don't recall the date, 01:31:30</p> <p>6 though. But if -- if you want to pause for a</p> <p>7 moment, I can look back and find that document.</p> <p>8 Q No. That's okay.</p> <p>9 Had -- had the Wheelers spoken to you about</p> <p>10 paying for his lawyers prior to January 21st, 2021? 01:31:45</p> <p>11 A Any lawyers?</p> <p>12 Can you -- can you -- can you -- or --</p> <p>13 Q Had Wheeler asked you to pay for any legal</p> <p>14 services prior to January 21st, 2021?</p> <p>15 A Yes. 01:32:05</p> <p>16 Q When?</p> <p>17 A I don't recall the exact date. I -- as I --</p> <p>18 as I offered, I could pull up the document, but I</p> <p>19 don't recall the exact date.</p> <p>20 Q What -- what document are you referring to? 01:32:11</p> <p>21 A It's an indemnification document that he</p> <p>22 asked me to write up.</p> <p>23 Q Okay.</p> <p>24 And you have it with you?</p> <p>25 A It's somewhere on my -- on my computer. I'll 01:32:21</p> <p style="text-align: right;">Page 59</p>	<p>1 Q Is this through -- okay. Okay.</p> <p>2 Is this 350,000 the first time that you paid</p> <p>3 for Dan Wheeler's lawyers?</p> <p>4 A No. There was another payment made.</p> <p>5 Q There was another payment? 01:34:05</p> <p>6 A There was another payment around \$20,000. I</p> <p>7 don't recall the date or to whom it was or the exact</p> <p>8 amount, but it should -- it -- it is in the -- it is</p> <p>9 in the bank records, because I considered it a</p> <p>10 transaction of -- you know, as -- considered it a 01:34:24</p> <p>11 transaction of Cred Capital, so...</p> <p>12 Q Okay.</p> <p>13 MR. EVANS: We could pull this document down,</p> <p>14 Sam.</p> <p>15 Sam, can you pull up the prior bank statement 01:34:49</p> <p>16 from January 2021?</p> <p>17 COURT REPORTER: Counsel, are we marking</p> <p>18 these documents?</p> <p>19 MR. EVANS: Yeah. That's Exhibit A, the</p> <p>20 first one.</p> <p>21 COURT REPORTER: So now we're going to B?</p> <p>22 MR. EVANS: This is Exhibit B, that's</p> <p>23 correct.</p> <p>24 ///</p> <p>25 ///</p> <p style="text-align: right;">Page 61</p>

16 (Pages 58 - 61)

<p>1 (Exhibit B was marked for 2 identification and is attached 3 hereto.) 4 BY MR. EVANS: 5 Q Mr. Alexander, do you have a trip planned to 01:35:13 6 Switzerland? 7 A Yeah. We scheduled -- we scheduled an event 8 there in August of this year. 9 Q Okay. 10 MR. EVANS: Can you scroll down to 01:35:34 11 January 15th, 2021 payment? 12 BY MR. EVANS: 13 Q We have an \$11,090 payment on January 15th, 14 2021. Is that for you to go to Switzerland, 15 Mr. Alexander? 01:35:53 16 A No. That's a prepayment that they required 17 for the event for the Marriott Hotel in -- or the 18 Bonvoy hotel in Geneva. 19 So it's -- yeah, these events take many 20 months to plan, so again, my role as the sole 01:36:10 21 director of -- of the company, the intention was to 22 organize a variety of -- of marketing and networking 23 events, and this -- this is one of them that -- that 24 is planned. 25 Q So you're planning on going to Switzerland to 01:36:26 Page 62</p>	<p>1 THE DEPONENT: So I have a variety of 2 consultants that I've worked with for -- since some 3 of them since July of last year to support the 4 marketing and sales effort for Cred Capital. So 5 when I refer to "we" in that context, it's the 01:37:57 6 marketing and sales consultants that are supporting 7 these events. 8 And there are supporting documents. You 9 know, e-mail campaigns that go out to people and -- 10 and other that promote these type of events. But 01:38:16 11 they are a form of business development that we 12 pursued at Cred Capital. 13 BY MR. EVANS: 14 Q You said there's a group of consultants, and 15 you were going to go on. Is this a ski trip? Is 01:38:35 16 that what this was? 17 A No. This was networking and -- and marketing 18 trip. And the locations are -- our business relies 19 on high-net-worth individuals, so the locations are 20 sometimes coincidental or -- or in places where 01:38:53 21 high-net-worth people gather. So 22 there's -- there's -- that's the only intention 23 of -- of being there versus someplace else. 24 Q Who, other than you from Cred Capital or Cred 25 Capital Consultants, attended the trip to Vail? 01:39:12 Page 64</p>
<p>1 market Cred Capital? That's your plan? 2 A No. The intention previously back in the 3 middle of January was to go to Switzerland. These 4 plans need to be revisited now based on -- on these 5 recent events. So there's no current plans to hold 01:36:44 6 that event. 7 Q When you say "based on these recent events," 8 what are you referring to? 9 A Based on the uncertainty surrounding Cred 10 Capital and the bankruptcy and these assets and my 01:36:57 11 personal situation. 12 Q On January 19th, 2021, we have a transaction 13 \$6,225.26 to Marriott Vail. 14 Were you in Vail? 15 A I was, yeah, for a -- 01:37:20 16 Q What were you doing in Vail? 17 A We organized a marketing and networking event 18 there way back in -- and I'll have to look back 19 exactly when we organized it. 20 Q Okay. 01:37:32 21 And what did you do in -- 22 MR. LUFT: Who is "we"? 23 COURT REPORTER: What? 24 MR. LUFT: I misheard. Who is -- Who is 25 "we"? 01:37:41 Page 63</p>	<p>1 A No others. 2 Q Okay. 3 So you went yourself to Vail, right? 4 A Yes. 5 Q Did I you go with anyone else? 01:39:20 6 A My wife was there also at the time. 7 Q Okay. 8 So you and your wife went to Vail? That's 9 what happened, right? 10 A Yes. 01:39:32 11 Q And the \$6,225.26, that was -- that was 12 payment for hotels and travel for you and your wife, 13 right? 14 A No. That was payment for the -- my 15 attendance at the event. 01:39:46 16 Q Uh-huh. 17 A I believe... 18 Q Let me ask you this: Did you go to Turkey on 19 December 4th, 2020? 20 A I have to look back in my records. When was 01:40:12 21 that. 22 Q I can jog your memory. You stayed at a hotel 23 on December 4, 2020 in Istanbul? 24 A Oh, yes, uh-huh. 25 Q Yeah. 01:40:23 Page 65</p>

<p>1 And the Cred Capital bank account paid for 2 that trip too? 3 A Absolutely. We're -- we have a project 4 ongoing there related to international trade finance 5 using the block chain that -- that we were trying to 01:40:32 6 get involved with. 7 Q Let me ask you this: The -- the three trips 8 that were paid for in January and December, the trip 9 to Switzerland, the trip to Vail, and the trip to 10 Istanbul -- 01:40:48 11 A There's no trip to -- there's no trip to 12 Switzerland. You are mistaken. That's a prepayment 13 for a -- a future event. 14 These events are planned many months in 15 advance, so there is often prepayment required, as 01:41:12 16 in the case of Vail, as in the case of Geneva, so... 17 MR. ASHWORTH: This is Sam Ashworth again. 18 Joe just went dark, so we may have lost him. I'll 19 just ask for your patience for one more moment. 20 MR. LUFT: Let's go off the record, then. 01:41:37 21 THE VIDEOGRAPHER: Okay. We're in agreement 22 to go off record? Okay. Stand by. 23 This marks the end of Media No. 5. Going off 24 the record at 1:41 p.m. 25 (Recess.) 01:41:53 Page 66</p>	<p>1 (Exhibit C was marked for 2 identification and is attached 3 hereto.) 4 MR. ASHWORTH: Joe, just bear with me. I'm 5 having a computer issue. 01:46:08 6 MR. EVANS: I could start with a few 7 questions while you're -- while you're working on 8 it. 9 BY MR. EVANS: 10 Q Mr. Alexander, in June of 2020, did you 01:46:19 11 receive 225 Bitcoin from Cred? 12 A Yes. 13 Q Okay. 14 And who sent you that Bitcoin? 15 A It was sent to me by Fireblocks. 01:46:34 16 Q Who did you ask to -- 17 A And I think -- 18 Q Who did you ask to transfer the Bitcoin to 19 you? 20 A I asked Daniyal Inamullah. 01:46:46 21 Do you want me to spell that, or to you 22 have... 23 Q I -- I think it's I-n-a-m-u-l-l-a-h. 24 A Sorry. Say it again. 25 I-n-a-m-u, double l, a-h. 01:47:03 Page 68</p>
<p>1 THE VIDEOGRAPHER: We are back on the record 2 at 1:44 p.m. Pacific, and this marks the beginning 3 of Media No. 6 in the deposition of James Alexander. 4 You can proceed, Counsel. 5 BY MR. EVANS: 01:44:36 6 Q Mr. Alexander, who joined you on your trip to 7 Istanbul? 8 A Nobody. 9 Q Okay. And who did you meet in Istanbul? 10 A Nobody in Istanbul. I traveled to a second 01:44:48 11 city call Mersin where the -- this agricultural 12 group is based. 13 Q Okay. 14 With respect to the prepayment of the 15 Switzerland trip, the Vail trip, and the Istanbul 01:45:05 16 trip, who authorized you to execute those 17 transactions out of the Cred Capital account? 18 A I did in my role as sole director of the 19 company. 20 MR. EVANS: Mr. Ashworth, please pull up the 01:45:33 21 declaration of James Alexander, which was filed on 22 January 6th as Exhibit 3. 23 COURT REPORTER: Exhibit C, right? 24 MR. EVANS: C, yes. 25 /// Page 67</p>	<p>1 I -- I asked Daniyal Inamullah to transfer. 2 Q And why did you ask Daniyal Inamullah to 3 transfer it to you? 4 A Because I believed the assets were at risk, 5 and I believed I was the sole director of the 01:47:22 6 company, and that the entire actions that were taken 7 by Schatt and other executives at Cred Inc were 8 specifically an asset grab for an independent 9 company that was independently funded. 10 So I sought to put the assets in a safe place 01:47:43 11 away from the reach of -- of -- of Cred Inc. 12 Q When you asked Mr. Inamullah to send you the 13 225 Bitcoin, did you ask him via WhatsApp? 14 A I -- I don't recall. I don't recall. 15 (Exhibit D was marked for 01:48:06 16 identification and is attached 17 hereto.) 18 BY MR. EVANS: 19 Q Do you remember submitting interrogatory 20 responses just a few days ago on Saturday? 01:48:13 21 A Uh-huh. 22 MR. GRIVNER: Object to the form. 23 COURT REPORTER: Who said that? 24 MR. GRIVNER: Mr. Grivner. 25 /// 01:48:38 Page 69</p>

<p>1 BY MR. EVANS:</p> <p>2 Q I'll make it easier, Mr. Alexander.</p> <p>3 A Which one are you specifically referring to?</p> <p>4 Q The --</p> <p>5 COURT REPORTER: Wait, wait, wait. Start</p> <p>6 over, Mr. Evans.</p> <p>7 BY MR. EVANS:</p> <p>8 Q I said, I'll make this easier, Mr. Alexander.</p> <p>9 In the document -- in the discovery request</p> <p>10 we sent you, we asked on Request No. 5 (as read): 01:48:48</p> <p>11 "All documents, communications,</p> <p>12 and records concerning the</p> <p>13 disposition of the cryptocurrency</p> <p>14 transferred to you on June 24,</p> <p>15 2020." 01:48:57</p> <p>16 You responded (as read):</p> <p>17 "Alexander is not in possession or</p> <p>18 control of any responsive documents</p> <p>19 based on his recollection that</p> <p>20 communications were via WhatsApp, 01:49:05</p> <p>21 and Alexander does not have any</p> <p>22 record of the conversation?</p> <p>23 A That's right. That's my recollection.</p> <p>24 That's -- which number are you on?</p> <p>25 Q That's Request No. 4 -- 5. 01:49:13</p> <p style="text-align: right;">Page 70</p>	<p>1 BY MR. EVANS:</p> <p>2 Q Did you delete the WhatsApps between yourself</p> <p>3 and Mr. Inamullah concerning the June 24th, 2020</p> <p>4 transactions?</p> <p>5 A I did not, no. 01:50:51</p> <p>6 Q Okay.</p> <p>7 So where are they?</p> <p>8 A As I said, you could either get them from</p> <p>9 Mr. Inamullah or -- my phone and my WhatsApp does</p> <p>10 not retain any record of those conversations. I 01:51:02</p> <p>11 don't know if his does.</p> <p>12 Q Well, you had Mr. -- and -- and -- and just</p> <p>13 to be clear, it was 225 Bitcoin and 200,000 USDC,</p> <p>14 right?</p> <p>15 A That's right, uh-huh. 01:51:20</p> <p>16 Q Okay.</p> <p>17 And when the funds -- when the cryptocurrency</p> <p>18 was transferred from the Fireblocks account of Cred</p> <p>19 to a digital wallet address, that digital wallet</p> <p>20 address was actually held by another individual, 01:51:34</p> <p>21 right?</p> <p>22 A That's right, yeah.</p> <p>23 Q So who is Christopher Giovanni Silvio</p> <p>24 Spadafora?</p> <p>25 A Chris Spadafora is -- is how I know him. He 01:51:43</p> <p style="text-align: right;">Page 72</p>
<p>1 A What -- Interrogatory 5, or was there</p> <p>2 another?</p> <p>3 Q That one was Request 5.</p> <p>4 A Request 5.</p> <p>5 MR. GRIVNER: If we're referring to 01:49:33</p> <p>6 documents, I think that they should at the very</p> <p>7 least be shared with -- with everyone, and if not,</p> <p>8 marked as an exhibit.</p> <p>9 THE DEPONENT: Yeah. This is correct as</p> <p>10 written in Response 5, Joe. It's -- I don't have a 01:49:44</p> <p>11 record of that, and I didn't -- I believe -- my</p> <p>12 recollection is I sent a screenshot to Inamullah</p> <p>13 when I had received the assets via WhatsApp.</p> <p>14 But I don't recall how much of our</p> <p>15 communication was by phone or by e-mail or by 01:50:05</p> <p>16 WhatsApp. And I -- and I don't -- and I don't have</p> <p>17 a record of the WhatsApp communication thread. By</p> <p>18 the very nature of that communication, it -- it</p> <p>19 doesn't retain a record, at least for -- on my side.</p> <p>20 You may be able to get that from -- from 01:50:20</p> <p>21 Inamullah.</p> <p>22 But I -- I -- I can confirm that we did</p> <p>23 communicate periodically and regularly by WhatsApp.</p> <p>24 But I don't have a record of it. So it's -- it's</p> <p>25 as -- it's -- it's -- it's as it's written there. 01:50:41</p> <p style="text-align: right;">Page 71</p>	<p>1 was a consultant to Cred Capital beginning around</p> <p>2 April of 2020.</p> <p>3 Q Why did you ask Mr. Inamullah to send 225</p> <p>4 Bitcoin and 200,000 USD coin of Cred's</p> <p>5 cryptocurrency to Chris Spadafora? 01:52:09</p> <p>6 A Chris was a consultant, a trusted consultant,</p> <p>7 and experienced crypto market participant, and so he</p> <p>8 seemed the most appropriate person.</p> <p>9 And as I recall, I wasn't in a position to</p> <p>10 actually receive the cryptocurrency. I didn't have 01:52:25</p> <p>11 a receiving wallet available, so yes.</p> <p>12 Q Maybe we can unpack that.</p> <p>13 What do you mean, you did not have a</p> <p>14 receiving wallet available?</p> <p>15 A I -- I didn't have -- I didn't have a wallet. 01:52:42</p> <p>16 I mean, my -- my crypto trading was -- was --</p> <p>17 my -- my -- my activity in crypto was through Cred</p> <p>18 Capital and through the Fireblocks network, and I</p> <p>19 didn't have access to that. I was cut off from the</p> <p>20 tech stack sometime before that. 01:53:04</p> <p>21 Q Didn't you have a Coinbase account at that</p> <p>22 time?</p> <p>23 A I don't -- I don't recall. And if I did,</p> <p>24 I -- I didn't think to use it.</p> <p>25 Q Okay. 01:53:22</p> <p style="text-align: right;">Page 73</p>

<p>1 MR. EVANS: Mr. Ashworth, can you please put 2 up Coinbase Transaction History 1? I think we're at 3 Exhibit -- we at Exhibit D, Sam? 4 MR. ASHWORTH: This is Exhibit E, echo. 5 (Exhibit E was marked for 01:53:44 6 identification and is attached 7 hereto.) 8 BY MR. EVANS: 9 Q This is Exhibit E. This is a Coinbase 10 transaction history that you provided your counsel, 01:53:53 11 and your counsel provided us. And it says your name 12 on the top, "Transaction report for James 13 Alexander," right? 14 A Yes. 15 Q And if you scroll down to the second page, 01:54:08 16 you will see transactions dating back to 2018. 17 Do you see that? 18 Mr. Alexander, do you see that? 19 A 2018. I see 2020. They're all mixed up, 20 these dates. Is there a time -- 01:54:39 21 Q If you look at the -- if you look at the 22 third transaction, it's a September 25th, 2018 ether 23 transaction, 10 ether. 24 Do you see that? 25 A Yeah. 01:54:50</p> <p style="text-align: right;">Page 74</p>	<p>1 Q So you asked Inamullah to sent it to 2 Spadafora's account because you didn't want Dan 3 Schatt or Joe Podulka to stop you from doing so, 4 right? 5 MR. GRIVNER: Object to the form. 01:56:26 6 BY MR. EVANS: 7 Q You can answer. 8 A Can you repeat the question, please? 9 Q You asked Inamullah to transfer the 225 10 Bitcoin and 200,000 USD coin to a digital wallet 01:56:44 11 address held by Chris Spadafora to avoid Dan Schatt 12 or Joe Podulka from stopping the transaction, right? 13 A No, that's not correct. I asked him because 14 I legitimately considered myself a sole director of 15 Cred Capital, and I believed that those assets 01:57:08 16 needed to be protected from an illegal corporate 17 takeover. 18 Q When you say "illegal corporate takeover," 19 who are you referring to? 20 A To -- to those individuals that you 01:57:19 21 reference, Schatt and Podulka that orchestrated an 22 illegal takeover of Cred Capital. 23 Q Okay. 24 But to be clear, you did the transaction in a 25 manner so it would not be detected by Schatt or 01:57:33</p> <p style="text-align: right;">Page 76</p>
<p>1 Q Okay. 2 So on June 24th, 2020, when you asked 3 Inamullah to transfer the cryptocurrency to Chris 4 Spadafora, you had an open Coinbase account that 5 could have received the Bitcoin, right? 01:55:00 6 A Well, I -- I don't recall that. I don't 7 recall having that account. I -- it's as simple as 8 that. 9 I mean, in the context of my work, I'm sure I 10 investigated a lot of platforms, and I'm sure 01:55:12 11 there's transactions that I don't recall. 12 And, you know, I guess the simple answer is 13 had I known that I had a wallet to receive them in, 14 I -- I expect I would have received those coins 15 directly. 01:55:31 16 There was -- but I -- and I -- to be clear, I 17 ordered a hardware wallet and received it, and once 18 I received it, I asked -- I directed our consultant, 19 Chris Spadafora, to send me those 225 coin, which he 20 did. 01:55:56 21 And, again, had I known I had a wallet to 22 receive them directly, I would have, but I -- and -- 23 and clearly, from these transactions, it would 24 appear this account has been open a lot longer than 25 I knew. So that's the only response I can provide. 01:56:10</p> <p style="text-align: right;">Page 75</p>	<p>1 Podulka, right? 2 A There was -- there was never an attempt to 3 avoid detection, but rather to put the assets in a 4 safe place. 5 Q Okay. 01:57:44 6 Had you asked Dan Schatt, would he let you 7 execute this transaction? 8 A I can't answer that question. 9 Q Why didn't you ask Dan Schatt if you could 10 execute this transaction? 01:58:02 11 A Schatt had no authorization over Cred 12 Capital. I was the sole director. 13 Q The Bitcoin and U.S. dollar coin were sitting 14 in Fireblocks' accounts held by Cred Inc.; isn't 15 that right? 01:58:15 16 A That's not correct. They were in Fireblocks' 17 accounts held by Cred Capital. 18 Q Uh-huh. Okay. 19 Did you ask Joe Podulka if you could execute 20 this transaction? 01:58:22 21 A Joe Podulka had no authorization. 22 Q So you didn't ask Joe Podulka if you could 23 execute this transaction, right? 24 A He had no authorization. There's no reason I 25 would ask him. 01:58:33</p> <p style="text-align: right;">Page 77</p>

20 (Pages 74 - 77)

<p>1 Q So the answer is no, right?</p> <p>2 A The answer is as I answered it.</p> <p>3 Q So you didn't ask him?</p> <p>4 A I did not ask him, no.</p> <p>5 Q Okay. And on July 1st of 2020, you received 01:58:47</p> <p>6 this 224.899 Bitcoin, right?</p> <p>7 A On which date?</p> <p>8 Q July 1st, 2020.</p> <p>9 A That's correct.</p> <p>10 Q Okay. 01:59:00</p> <p>11 MR. EVANS: Sam, you can take down</p> <p>12 this -- this document.</p> <p>13 BY MR. EVANS:</p> <p>14 Q And when you received the 225 Bitcoin, you</p> <p>15 received it in one of your Ledger wallets, right? 01:59:11</p> <p>16 A Yes.</p> <p>17 Q And what's a Ledger wallet?</p> <p>18 A A Ledger wallet is a hardware wallet.</p> <p>19 Q Okay. What does that mean?</p> <p>20 A A hardware wallet is from -- from what I 01:59:23</p> <p>21 know, a more secure offline way to store assets.</p> <p>22 Q Okay.</p> <p>23 So on July 1st, 2020, 225 Bitcoin was</p> <p>24 transmitted to you in your Ledger wallet, and you</p> <p>25 took possession of it, right? 01:59:46</p> <p style="text-align: right;">Page 78</p>	<p>1 Q Sure.</p> <p>2 The California court ordered that you cannot</p> <p>3 move Cred cryptocurrency or Cred Capital</p> <p>4 cryptocurrency, correct?</p> <p>5 A I don't know. I have to consult with counsel 02:01:28</p> <p>6 if you're looking for a specific answer.</p> <p>7 Q Okay.</p> <p>8 Isn't it true that the day before the</p> <p>9 hearing, you had transferred 60 -- 65 Bitcoin out of</p> <p>10 your wallet and another 200,000 USD coin out of your 02:01:44</p> <p>11 wallet?</p> <p>12 A The former transaction I recall. The latter</p> <p>13 transaction, I do not.</p> <p>14 Q Okay.</p> <p>15 A And that former transaction was part of a 02:01:59</p> <p>16 scheduled liquidation to -- to -- to continue to</p> <p>17 fund working capital at Cred Capital, which was a</p> <p>18 pattern that continued from the moment Cred Capital</p> <p>19 received the initial equity investment through our</p> <p>20 entire tenure. 02:02:16</p> <p>21 The initial capitalization of Cred Capital</p> <p>22 was meant to be liquidated in a systematic way to</p> <p>23 provide working capital.</p> <p>24 Q Okay.</p> <p>25 Let's talk about the first transaction. 02:02:28</p> <p style="text-align: right;">Page 80</p>
<p>1 A That's correct, yes.</p> <p>2 Q And on -- let me make sure I get these dates</p> <p>3 right, but on June 26th, Cred fired you, right?</p> <p>4 A Cred purported to fire me.</p> <p>5 Q Okay. 02:00:09</p> <p>6 There came a time when Cred sued you in</p> <p>7 California State Court, right?</p> <p>8 A I don't -- I don't know what that means. I'm</p> <p>9 not a lawyer. I know there were various legal</p> <p>10 actions. I -- I don't know what that means. 02:00:19</p> <p>11 Q Did Cred file a lawsuit against you on</p> <p>12 July 16th, 2020 in San Mateo State Court?</p> <p>13 A I don't know. I'd have to consult with</p> <p>14 counsel. I -- I -- I'm not a lawyer.</p> <p>15 Q Do you recall a Temporary Restraining Order 02:00:48</p> <p>16 hearing occurring in California State Court on</p> <p>17 July 16th, 2020?</p> <p>18 A I do.</p> <p>19 Q I'm sorry?</p> <p>20 A Yes. 02:01:02</p> <p>21 Q Okay.</p> <p>22 And what happened at that court hearing on</p> <p>23 July 17th, 2020?</p> <p>24 A I don't recall specifically the legal terms,</p> <p>25 but can you be more specific? 02:01:15</p> <p style="text-align: right;">Page 79</p>	<p>1 MR. EVANS: Sam, please pull up Coinbase</p> <p>2 History 1.</p> <p>3 And what exhibit number is this, Sam?</p> <p>4 MR. ASWORTH: This is Exhibit E, Joe. E,</p> <p>5 echo. 02:02:58</p> <p>6 BY MR. EVANS:</p> <p>7 Q So the first transaction on this screen, a</p> <p>8 July 1st, 2020 transaction of ten Bitcoin.</p> <p>9 Do you see that?</p> <p>10 A Can you move a cursor or something to bring 02:03:07</p> <p>11 my attention to it otherwise?</p> <p>12 Yes, I see it now, uh-huh.</p> <p>13 Q Okay.</p> <p>14 And do you recall this July 1st, 2020</p> <p>15 transaction? 02:03:20</p> <p>16 A Not specifically, but this is an account I</p> <p>17 control, so I think we should assume that I -- I had</p> <p>18 control of these accounts.</p> <p>19 Q And so just so I get it straight, you had a</p> <p>20 Ledger wallet that held the 225 Bitcoin, and then 02:03:36</p> <p>21 you also had this Coinbase account, right?</p> <p>22 A Yes, that's correct.</p> <p>23 Q Okay.</p> <p>24 So why did you transfer ten Bitcoin from your</p> <p>25 Ledger wallet to your Coinbase account on July 1st, 02:03:51</p> <p style="text-align: right;">Page 81</p>

21 (Pages 78 - 81)

<p>1 2020?</p> <p>2 A This was part of a systematic liquidation of</p> <p>3 those original Bitcoin that were an equity</p> <p>4 contribution to Cred Capital. It was initially 300.</p> <p>5 And they were systematically liquidated to provide 02:04:06</p> <p>6 working capital for the ongoing operations of Cred</p> <p>7 Capital.</p> <p>8 And its Coinbase was used to liquidate</p> <p>9 because it's an exchange, not a wallet, and so it's</p> <p>10 possible to actually liquidate for U.S. dollars in 02:04:20</p> <p>11 this case, the -- the Bitcoin.</p> <p>12 Q So what -- what was the capital that you</p> <p>13 needed? What was the expense that you needed to pay</p> <p>14 for that caused you to liquidate ten Bitcoin?</p> <p>15 A Well, it was -- it's systematic the way we 02:04:39</p> <p>16 liquidated, so it was establishing adequate -- what</p> <p>17 I believe to be adequate working capital to operate</p> <p>18 the business. So it was the ongoing expenses</p> <p>19 associated with Cred Capital.</p> <p>20 Q Okay. 02:04:51</p> <p>21 And this is July 1st, 2020, and you said that</p> <p>22 Cred purported to fire you on June 26, 2020, right?</p> <p>23 A From -- from which entity?</p> <p>24 Q From either entity.</p> <p>25 A Well, I was terminated on May 30th from Cred 02:05:09</p> <p style="text-align: right;">Page 82</p>	<p>1 Q And ultimately, James, you liquidated the 65</p> <p>2 Bitcoin and ten Bitcoin and sent it to where?</p> <p>3 A I sent it to a dedicated account.</p> <p>4 Q What is the dedicated -- the dedicated</p> <p>5 account? 02:06:54</p> <p>6 A I don't know. I'd have to get back to you on</p> <p>7 exact numbers on that.</p> <p>8 So -- actually, sorry. Can I -- can I</p> <p>9 correct that answer? I --</p> <p>10 Q Sure. 02:07:08</p> <p>11 A So, yeah, I need to refer to my records</p> <p>12 because I don't think that initial transfer was to a</p> <p>13 dedicated account, so I need to correct that. But</p> <p>14 I'm going to need to get back to you on exactly</p> <p>15 where the proceeds were transferred. I -- I don't 02:07:26</p> <p>16 have access to that -- those account numbers or that</p> <p>17 data.</p> <p>18 Q So let -- let me just understand it, that the</p> <p>19 75 Bitcoin that was liquidated at Coinbase, those</p> <p>20 proceeds were Cred Capital proceeds, right? 02:07:40</p> <p>21 A Those -- those were proceeds of an equity</p> <p>22 investment into Cred Capital, yes. Is that what you</p> <p>23 mean?</p> <p>24 Q You said you liquidated -- you liquidated</p> <p>25 them to pay for operating expenses for Cred Capital, 02:08:00</p> <p style="text-align: right;">Page 84</p>
<p>1 Inc., and I became a full-time employee of Cred</p> <p>2 Capital, Inc. on June 1st, 2020.</p> <p>3 So I was purported to have been fired on that</p> <p>4 date that you referenced from Cred Capital.</p> <p>5 Q Okay. 02:05:33</p> <p>6 A Which I believe -- I believed at the time and</p> <p>7 I continue to believe that there was no</p> <p>8 authorization by either Schatt or Podulka to fire</p> <p>9 me.</p> <p>10 Q On July 16th, 2020, there was another 65 02:05:48</p> <p>11 Bitcoin transaction.</p> <p>12 Do you see that?</p> <p>13 A Can you hover or otherwise bring my attention</p> <p>14 to it?</p> <p>15 Q It's the third transaction down the line. 02:05:59</p> <p>16 A So that was -- it -- it appears that that's</p> <p>17 65 Bitcoin received into the Coinbase account.</p> <p>18 Is that -- is that what you're referencing?</p> <p>19 Q Yes.</p> <p>20 And that 65 Bitcoin came from your Ledger 02:06:12</p> <p>21 wallet that originally received the 225 Bitcoin; is</p> <p>22 that right?</p> <p>23 A On -- yeah. On July 16th, I sent 65 Bitcoin</p> <p>24 from the Ledger hardware device to this Coinbase</p> <p>25 account. 02:06:35</p> <p style="text-align: right;">Page 83</p>	<p>1 right? That's the purpose for the liquidation?</p> <p>2 A That is correct, yes.</p> <p>3 Q Okay.</p> <p>4 And do you recall what date you liquidated</p> <p>5 these Bitcoin? 02:08:17</p> <p>6 A I would have to refer to the transaction log.</p> <p>7 I believe you have that in front of you. Is there</p> <p>8 any reason to doubt that, or is there another reason</p> <p>9 you are asking that question?</p> <p>10 Q Why don't we do it this way. 02:08:28</p> <p>11 MR. EVANS: Sam, can you pull up as Exhibit F</p> <p>12 the Temporary Injunction and Restraining Order filed</p> <p>13 in San Mateo Superior Court?</p> <p>14 (Exhibit F was marked for</p> <p>15 identification and is attached 02:09:00</p> <p>16 hereto.)</p> <p>17 BY MR. EVANS:</p> <p>18 Q So, Mr. Alexander, this is a Temporary</p> <p>19 Restraining Order and Preliminary Injunction that</p> <p>20 was issued on July 17th by the San Mateo State 02:09:07</p> <p>21 Court.</p> <p>22 Do you recall this document?</p> <p>23 A I do not.</p> <p>24 Q Okay.</p> <p>25 MR. EVANS: If you want to zoom in a little 02:09:14</p> <p style="text-align: right;">Page 85</p>

22 (Pages 82 - 85)

<p>1 bit, Sam.</p> <p>2 BY MR. EVANS:</p> <p>3 Q You will see the plaintiffs are Cred Inc. and</p> <p>4 Cred Capital and the defendant is you.</p> <p>5 Do you see that? 02:09:24</p> <p>6 A Okay.</p> <p>7 Q Okay.</p> <p>8 And do you see that the date is July 17th,</p> <p>9 2020 at 2:00 p.m.?</p> <p>10 Do you see that? 02:09:31</p> <p>11 A Yes.</p> <p>12 Q Okay.</p> <p>13 And that's the same day that you sent 65</p> <p>14 Bitcoin from your Ledger account to your Coinbase</p> <p>15 account, right? 02:09:40</p> <p>16 A No. It was the prior day, if you look at the</p> <p>17 timestamps.</p> <p>18 Q Oh, so you sent -- you sent it the day before</p> <p>19 the hearing, you are saying?</p> <p>20 A Well, that is coincidental. It was part of a 02:09:47</p> <p>21 scheduled liquidation to pay for working capital</p> <p>22 expenses. It's -- if you -- can you go back to the</p> <p>23 Coinbase?</p> <p>24 Q Sure.</p> <p>25 MR. EVANS: Go back to the last exhibit, Sam, 02:10:03</p> <p style="text-align: right;">Page 86</p>	<p>1 break. I will also note that I have a -- a</p> <p>2 commitment in the next couple minutes, but by all</p> <p>3 means, wrap up where -- where you are, but I would</p> <p>4 ask that we have a break in the next few minutes.</p> <p>5 MR. EVANS: I only have a few more questions 02:11:16</p> <p>6 on this topic, and then we will be able to come to a</p> <p>7 natural break in a few minutes.</p> <p>8 Sam, can you scroll down just a -- just a</p> <p>9 hair to the next page?</p> <p>10 BY MR. EVANS: 02:11:28</p> <p>11 Q Okay.</p> <p>12 So just so I get this straight,</p> <p>13 Mr. Alexander, you're saying that the liquidation</p> <p>14 was the day before the hearing, not the day of the</p> <p>15 hearing, right? 02:11:40</p> <p>16 A That's what this record indicates, yes.</p> <p>17 Q Okay.</p> <p>18 MR. EVANS: Sam, can you please refer back to</p> <p>19 the court document, the preliminary injunction order</p> <p>20 from the San Mateo State Court? 02:11:47</p> <p>21 BY MR. EVANS:</p> <p>22 Q Mr. Alexander, do you see where it says,</p> <p>23 "Verified Complaint Filed July 15, 2020"?</p> <p>24 A Yes.</p> <p>25 Q Okay. 02:11:58</p> <p style="text-align: right;">Page 88</p>
<p>1 please.</p> <p>2 THE DEPONENT: And so what date were those</p> <p>3 assets liquidated?</p> <p>4 BY MR. EVANS:</p> <p>5 Q These are your records, and I'm seeing -- 02:10:18</p> <p>6 A Yeah.</p> <p>7 Q -- a section of 65 Bitcoin and a section of</p> <p>8 ten Bitcoin.</p> <p>9 A And on the 16th, the sale of those Bitcoin</p> <p>10 occurred, which was fully a day before that court 02:10:27</p> <p>11 action.</p> <p>12 So that --</p> <p>13 MR. GRIVNER: (Unintelligible) go back.</p> <p>14 THE DEPONENT: That filing I think you</p> <p>15 referred to it as. 02:10:36</p> <p>16 BY MR. EVANS:</p> <p>17 Q Uh-huh. And just when you're talking about</p> <p>18 liquidation, there's 56 Bitcoin and four Bitcoin.</p> <p>19 So there's still another six, right?</p> <p>20 A No. But those transactions are listed below 02:10:47</p> <p>21 there.</p> <p>22 Q Okay.</p> <p>23 A Same date.</p> <p>24 MR. GRIVNER: Mr. Alexander asked for a break</p> <p>25 a while ago, or he had indicated that he needed a 02:11:03</p> <p style="text-align: right;">Page 87</p>	<p>1 So you were sued on July 15th, 2020, and then</p> <p>2 you liquidated these assets on July 16th, 2020,</p> <p>3 right?</p> <p>4 A Yes, that is correct.</p> <p>5 Q Okay. 02:12:09</p> <p>6 MR. EVANS: We can come to a break. What do</p> <p>7 you think? Ten minutes?</p> <p>8 MR. GRIVNER: I need slightly more time than</p> <p>9 that just because of a child thing -- a child</p> <p>10 commitment. Can we say 5:35? I apologize. I know 02:12:21</p> <p>11 that's a little bit longer than we otherwise would,</p> <p>12 but I do have this obligation, and I'm sorry.</p> <p>13 MR. EVANS: Okay. It's not a problem. We</p> <p>14 might need the time on the back end.</p> <p>15 MR. GRIVNER: Understood. 02:12:30</p> <p>16 MR. EVANS: Just so you know.</p> <p>17 MR. GRIVNER: Understood.</p> <p>18 So 5:35.</p> <p>19 THE VIDEOGRAPHER: Okay. Going off the</p> <p>20 record. Stand by. This marks the end of Media 02:12:37</p> <p>21 No. 6. Going off the record at 2:12 p.m. Pacific.</p> <p>22 (Recess.)</p> <p>23 THE VIDEOGRAPHER: We are back on the record</p> <p>24 at 2:38 p.m. Pacific, and this marks the beginning</p> <p>25 of Media No. 7 in the deposition of James Alexander. 02:38:57</p> <p style="text-align: right;">Page 89</p>

<p>1 You may proceed, Counsel.</p> <p>2 MR. EVANS: Mr. Ashworth, can you please pull</p> <p>3 up the preliminary -- the Temporary Restraining</p> <p>4 Order from the California State Court?</p> <p>5 What exhibit is that, Sam? 02:39:13</p> <p>6 MR. ASHWORTH: This is F, Joe.</p> <p>7 BY MR. EVANS:</p> <p>8 Q So this is Exhibit F, Mr. Alexander. This is</p> <p>9 a Temporary Restraining Order from the California</p> <p>10 State Court that we talked about previously. 02:39:29</p> <p>11 MR. EVANS: Can you scroll down to the second</p> <p>12 page?</p> <p>13 BY MR. EVANS:</p> <p>14 Q Under Paragraph 1, this California State</p> <p>15 Court order states the following (as read): 02:39:44</p> <p>16 "Defendant and his agents are</p> <p>17 hereby ordered not to transfer,</p> <p>18 transmit, or use, or cause or permit</p> <p>19 anyone else to transfer, transmit,</p> <p>20 or use, any Cred and/or Cred Capital 02:39:55</p> <p>21 digital assets in their possession,</p> <p>22 custody and/or control."</p> <p>23 Do you see that language, Mr. Alexander?</p> <p>24 A Which paragraph is that?</p> <p>25 Q This is Paragraph 1. 02:40:10</p> <p style="text-align: right;">Page 90</p>	<p>1 Capital cryptocurrency.</p> <p>2 Do you recall that?</p> <p>3 A Yes.</p> <p>4 Q And do you also have a Ledger -- a wallet in</p> <p>5 your Ledger accounts that hold a series of different 02:41:23</p> <p>6 kinds of cryptocurrency that are cryptocurrency,</p> <p>7 right?</p> <p>8 A Yes.</p> <p>9 Q And, in fact, the other day you transferred</p> <p>10 some of that Cred crypto -- Cred Capital 02:41:33</p> <p>11 cryptocurrency to the debtors, right?</p> <p>12 A As much as I could, yes.</p> <p>13 Q Okay.</p> <p>14 So following the July 16th -- July 17th, 2020</p> <p>15 order from the California State Court, you did, in 02:41:47</p> <p>16 fact, transfer digital assets that were Cred Capital</p> <p>17 digital assets, didn't you?</p> <p>18 A To answer that question, can we read further</p> <p>19 in this paragraph?</p> <p>20 Q Mr. Alexander, it's a simple question. Did 02:42:14</p> <p>21 you transfer Cred Capital crypto after this order or</p> <p>22 not?</p> <p>23 A I did, yes.</p> <p>24 Q Okay.</p> <p>25 MR. EVANS: You can take this down, Sam. 02:42:22</p> <p style="text-align: right;">Page 92</p>
<p>1 A Yes, I see that.</p> <p>2 Q Okay.</p> <p>3 A And what are the addresses below?</p> <p>4 Q Mr. Alexander, were you aware of this order?</p> <p>5 A Yes. 02:40:22</p> <p>6 Q Okay.</p> <p>7 And you had counsel when you were defending</p> <p>8 this Temporary Restraining Order, right?</p> <p>9 A Yes.</p> <p>10 Q Okay. 02:40:32</p> <p>11 And this order is dated July 16th, 2020,</p> <p>12 right -- July 17th, 2020? I apologize.</p> <p>13 A Yeah, July 17th.</p> <p>14 Q Okay.</p> <p>15 Did you transfer, transmit, or use any Cred 02:40:43</p> <p>16 or Cred Capital digital assets following July 17,</p> <p>17 2020?</p> <p>18 A I don't know. I -- I don't recognize those</p> <p>19 addresses there that are referenced.</p> <p>20 Q Do you recognize the name Cred Capital? 02:40:59</p> <p>21 A Yes.</p> <p>22 Q Do you recognize the name Cred?</p> <p>23 A Yes.</p> <p>24 Q And before the break, we were talk -- we were</p> <p>25 looking at your Coinbase account that held Cred 02:41:09</p> <p style="text-align: right;">Page 91</p>	<p>1 Can you please pull up Coinbase Transaction</p> <p>2 History 1 and -- and remind the court reporter of</p> <p>3 the exhibit. Sorry. I don't have the exhibit</p> <p>4 number in front of me.</p> <p>5 MR. ASHWORTH: E, echo, Joe. 02:42:51</p> <p>6 MR. EVANS: Echo.</p> <p>7 Scroll to the first page, please.</p> <p>8 BY MR. EVANS:</p> <p>9 Q Mr. Alexander, these are the transactions</p> <p>10 that were executed on July 16th, the day before the 02:43:02</p> <p>11 Temporary Restraining Order was issued. And if you</p> <p>12 see the fourth and fifth and sixth and seventh and</p> <p>13 eighth transaction on this page, it appears that you</p> <p>14 are liquidating the Bitcoin contained in this</p> <p>15 Coinbase account. 02:43:18</p> <p>16 Is that a fair and accurate description?</p> <p>17 A I don't recognize those transactions. I</p> <p>18 mean, they're -- it looks like they're one -- are</p> <p>19 they one Bitcoin each?</p> <p>20 Q The first transaction is 4.96 Bitcoin. 02:43:28</p> <p>21 Do you see that?</p> <p>22 A Yeah.</p> <p>23 Q The second transaction is 56 Bitcoin.</p> <p>24 Do you see that?</p> <p>25 A Yes, I do. 02:43:42</p> <p style="text-align: right;">Page 93</p>

<p>1 Is there any -- I'm sorry. I don't recognize 2 any of the transactions. I -- I can't answer that. 3 I -- I -- I don't know. I recall the original 4 transaction, which was a systematic liquidation, but 5 I don't recognize the smaller ones there. 02:43:53 6 I don't know why there would be one, one, 7 three. I -- I don't know. I -- I can't... 8 Q Okay. 9 But this -- this is your Coinbase account, 10 right? These are transactions that you executed? 02:44:14 11 A Yes. 12 Q Okay. 13 The -- the only thing I'm getting to is 14 the -- the large transaction here, the 56 Bitcoin 15 transaction, that's \$500,430.80, correct? 02:44:19 16 A Yes. 17 Q And then we have a series of other 18 transactions where it appears that a total of 59 or 19 65 Bitcoin, approximately, are -- are executed. So 20 we have the first one -- the fourth transaction was 02:44:38 21 4.9. 22 Do you see that? 23 A Yes, uh-huh. 24 Q And then we have the sixth transaction for 25 one, seventh transaction for another one, and then 02:44:50 Page 94</p>	<p>1 BY MR. EVANS: 2 Q You have a JPMorgan Chase account, right, 3 Mr. Alexander? 4 A Yes. 5 Q And, in fact, you -- you produced the account 02:46:10 6 statements for that JPMorgan Chase account earlier 7 this week, correct? 8 A Absolutely, yeah. 9 Q Okay. 10 MR. ASWORTH: I apologize. Which date would 02:46:30 11 you like on that? 12 MR. EVANS: July 31st. The document is 13 2020731-statements. 14 MR. ASWORTH: My Adobe is crashing out. It 15 will just be one second. I just have to close this 02:46:58 16 part right now. 17 MR. EVANS: Okay. Okay. 18 What letter are we up to, Sam? 19 MR. ASWORTH: It's G, golf. 20 BY MR. EVANS: 02:47:40 21 Q Mr. Alexander, as Exhibit G, this is a 22 JPMorgan Chase statement from July 1st, 2020 to 23 July 31st, 2020, and it has your name on the top. 24 Do you see that? 25 A Yes. 02:47:55 Page 96</p>
<p>1 some time later, we have -- we have three more, but 2 that's not till August. 3 So on July 16th, it appears that there's a 4 liquidation of approximately 62 Bitcoin, correct? 5 A That's -- that's correct. 02:45:15 6 Q Okay. 7 And so once you liquidated -- 8 COURT REPORTER: What's your answer? 9 THE DEPONENT: Yes, that's correct. 10 BY MR. EVANS: 02:45:16 11 Q After this Bitcoin was liquidated on 12 July -- on July 16th, where did it go? 13 A I'm going to have to get back to you on that. 14 I -- I don't recall where it was transferred to, but 15 it was -- I can confirm it was transferred to an 02:45:32 16 account controlled by me. 17 Q Okay. 18 A But I just don't -- I don't have the details. 19 I'll have to get back to you. 20 MR. EVANS: Mr. Ashworth, can you pull up the 02:45:44 21 JPMorgan Chase account statement for July 31st, 22 2020? 23 (Exhibit G was marked for 24 identification and is attached 25 hereto.) Page 95</p>	<p>1 Q Okay. 2 And these are one of the account statements 3 that you provided to us through your counsel, right? 4 A Yes. 5 Q Okay. 02:48:03 6 MR. EVANS: And, Sam, if you could scroll 7 down to Page 8. 8 BY MR. EVANS: 9 Q Do you see on Page 8, there's a July 22nd, 10 \$500,000 credit into this account? 02:48:21 11 Do you see that? 12 A Uh-huh. Yes. 13 Q Okay. 14 And -- and just so I understand, this 15 JPMorgan Chase account with your name on it, this is 02:48:30 16 holding Cred Capital funds, right? 17 A Yeah. That -- that is that's the destination 18 account for that original transaction in Coinbase to 19 fund -- to provide working capital for Cred Capital, 20 yes. 02:48:46 21 Q Okay. 22 So everything in this account is to provide 23 working capital for Cred Capital, correct? 24 A Well, I -- I -- I can't confirm that to you. 25 Is there an account number in there, something -- 02:48:56 Page 97</p>

25 (Pages 94 - 97)

<p>1 Q It's on the top right-hand corner. It says 2 "B41716006." 3 A I -- I can't answer that question, but the 4 question I think you're getting at is have I swept 5 that account or provided everything in that account 02:49:10 6 to the debtors, and -- and the answer to that 7 question is yes. I mean, I don't mean to... 8 Q So on July 22nd, \$500,000 comes into this 9 JPMorgan Chase account. Is that the proceeds of the 10 Coinbase transactions that we just looked at? 02:49:27 11 A It is, yes. 12 Q Okay. 13 And it doesn't appear that this credit came 14 from Coinbase, so where did it come from? 15 A I -- I -- no. That -- I mean, as far as I 02:49:38 16 know, that came from Coinbase. 17 Q Okay. 18 In the description, it says (as read): 19 "Fedwire credit Wells Fargo Bank: 20 James Alexander Sherman Oaks, 02:49:53 21 California." 22 That's your name, right? This is your 23 account? 24 A No. I mean, as I said before, I -- I -- I 25 need to check my records, but my recollection is 02:50:02 Page 98</p>	<p>1 reviewed, the 56 Bitcoin transaction is 508,000. 2 Do you see that? 3 A Uh-huh. 4 Q After fees, it's \$500,430.80? 5 A Okay. 02:51:30 6 Q Okay. 7 So where is the rest of the proceeds? You 8 have a \$45,000 transaction, a \$10,000 transaction, 9 another \$10,000 transaction, so where is the rest of 10 it? 02:51:40 11 A I'm not following you. Can you... 12 Q On July 16th, there are four transactions at 13 which Bitcoin was liquidated. 14 A Yeah. Joe, I -- I can't answer that. I 15 don't recall. I don't know. 02:51:58 16 Q Okay. 17 So you don't know where the rest of the -- 18 where the rest of the cash proceeds were? 19 A You have all of the bank statements that you 20 have requested, and I will provide any documentation 02:52:03 21 you need, but I don't recall specifically these -- 22 these transactions you are referencing. That's as 23 much as -- as I can say. 24 Q You are aware that you were required to 25 provide all bank accounts and all bank statements 02:52:16 Page 100</p>
<p>1 that this is the account that received the initial 2 Coinbase transaction. 3 Thereafter, a dedicated account was 4 established, and that was subsequently used from 5 around August 1st onward, so... 02:50:15 6 Q When you say "a dedicated account," what do 7 you mean? 8 A I mean the Wells Fargo statements that you 9 showed me, the account ending 9235, which is the 10 James Alexander d/b/a James Alexander Cred account. 02:50:28 11 Q Okay. 12 So what about this Wells Fargo account, the 13 one that put in the 500,000 here? Where did that 14 come from? 15 A I can't comment on the description. I -- it 02:50:39 16 wasn't generated by me. It was generated by -- by 17 Morgan Stanley, and I don't know. I -- I can't 18 answer that. I -- I don't know. 19 Q Okay. 20 A I can only tell you what my recollection of 02:50:51 21 the series of transactions is. 22 MR. EVANS: Sam, can you go back to the 23 Coinbase records we were just looking at? 24 BY MR. EVANS: 25 Q And if you look at these transactions we just 02:51:10 Page 99</p>	<p>1 that ever had Cred Capital proceeds in them, right? 2 A I -- I -- I don't know the answer to that. 3 Q You don't know the answer to that? 4 So did you provide all bank statements -- 5 A I have provided everything -- 02:52:31 6 Q -- for all accounts that are Cred Capital? 7 A I have provided everything I have been asked 8 to provide and will be absolutely -- and will 9 continue to provide everything that I'm asked to 10 provide. 02:52:43 11 But I -- I can't answer your question because 12 I -- I don't know if it references all of the 13 documents that I have provided or not. But I have 14 provided everything that I have been asked to 15 provide and have been as complete -- absolutely as 02:52:55 16 complete as possible. 17 Q Uh-huh. 18 MR. EVANS: Sam, please go back to the 19 JPMorgan Chase document, Page 8. 20 BY MR. EVANS: 02:53:04 21 Q We have a July 22nd transaction with a Wells 22 Fargo bank account with your name on it. 23 Do you see that? 24 A I do. 25 MR. EVANS: Sam, please pull up the Wells 02:53:36 Page 101</p>

<p>1 Fargo bank statements that are provided by 2 Mr. Alexander. 3 MR. ASWORTH: (Simultaneous speech.) 4 MR. EVANS: It's called "Wells Fargo Account 5 Statements." 6 What number -- what letter are we up to, Sam? 7 H? 8 MR. ASWORTH: That's correct, Joe. This is 9 Exhibit H. 10 (Exhibit H was marked for 11 identification and is attached 12 hereto.) 13 BY MR. EVANS: 14 Q Exhibit H. 15 This is a August -- these are a series of 02:54:23 16 bank statements you provided to your counsel. We 17 have talked about them before, the name James 18 Alexander d/b/a James Alexander Cred? 19 Do you see that? 20 A Yes. 02:54:35 21 MR. EVANS: Sam, can you go to the first 22 transaction on August 11th? 23 BY MR. EVANS: 24 Q It's a \$100 deposit to open up this account? 25 A I see that there. 02:54:46</p> <p style="text-align: right;">Page 102</p>	<p>1 Q Yeah. So that's not really how it works. 2 The order was for you to provide all of the account 3 statements and details concerning accounts that held 4 Cred Capital assets. 5 You have a \$500,000 transaction going into 02:56:16 6 the JPMorgan Chase account from a Wells Fargo 7 account with your name on it. 8 A Yes. So I confirmed that. That's my 9 recollection of the transactions that occurred also. 10 Q Okay. 02:56:30 11 So that July 22nd transaction, that was with 12 your personal Wells Fargo account, right? 13 A Can you pull up that statement? 14 Q We don't have your personal statement because 15 you haven't given it to us. 02:56:43 16 A Oh, that's part of part two discovery. Yeah. 17 I -- I don't have the data to answer that question, 18 then. 19 MR. GRIVNER: I will note for the record that 20 that information will be provided pursuant to the 02:57:02 21 part two discovery that has been requested. 22 BY MR. EVANS: 23 Q Did there come a time where you moved 50 24 Bitcoin on January 16th, 2021? 25 A Yes. 02:57:22</p> <p style="text-align: right;">Page 104</p>
<p>1 Q The JPMorgan Chase transaction for \$500,000 2 was on July 22nd from an account in your name. 3 Do you have another Wells Fargo account, 4 James? 5 A Sorry. What do you mean? Besides this one? 02:54:57 6 Q Yes. 7 A I have a personal Wells Fargo account that is 8 James Alexander and includes this James Alexander 9 d/b/a James Alexander Cred. 10 So I -- I -- I'm not sure if that answers 02:55:18 11 your question or not, but that's... 12 Q Did the July -- did the \$500,000 July 22nd 13 transaction, did that come from your personal 14 account at Wells Fargo? 15 A Sorry. Can you repeat that? 02:55:30 16 Q The July 22nd, \$500,000 transaction in the 17 JPMorgan Chase account, did that come from your 18 Wells Fargo account, your personal line? 19 A I don't -- I don't know. I've told you my 20 recollection of the transactions. You have the bank 02:55:50 21 statements here. I haven't had the benefit of 22 reviewing these. But I told you my recollection. 23 If you have the bank statements here, you'll have to 24 show me the data, and I can confirm it or not 25 confirm it, but that's... 02:56:04</p> <p style="text-align: right;">Page 103</p>	<p>1 Q And why did you move 50 Bitcoin on 2 January 16, 2021? 3 A I was -- I had COVID at the time, and I 4 thought it would be prudent to move those assets 5 onto some things more accessible, a more accessible 02:57:37 6 device should I become incapacitated, and so that's 7 what I did. 8 Q Okay. 9 And when you said you were moving it to 10 somewhere more accessible, where did you move it? 02:57:52 11 A I moved it to a Coinbase account. 12 Q Okay. 13 And who has access to that Coinbase account? 14 A Myself. 15 Q Okay. 02:58:02 16 And what did you do with the 50 Bitcoin after 17 it went to the Coinbase account on January 16? 18 A They were eventually liquidated for dollars. 19 Q Okay. 20 And on January 16th, 2021, you were aware, 02:58:18 21 were you not, that there was a court order 22 precluding you from moving any cryptocurrency that 23 was related to Cred Capital, right? 24 A Yes. 25 Q And you moved it anyway? 02:58:30</p> <p style="text-align: right;">Page 105</p>

<p>1 A I moved it anyway because I was 2 incapacitated, and I was, you know, in fear of -- 3 I -- I thought I was dying, and I didn't want to 4 leave a hardware wallet inaccessible to where those 5 assets couldn't be accessed. 02:58:46 6 Q Uh-huh. 7 And you never -- you never asked anybody to 8 reach out to the debtors on this issue, did you? 9 A I did not. I was incapacitated, as I said. 10 Q Uh-huh. 02:58:59 11 And on January 17, 2021, you executed an 12 additional 50 Bitcoin transaction, didn't you? 13 A That -- that's -- that's -- yes, that's 14 right. 15 Q Okay. 02:59:07 16 And on both of those days, when you executed 17 the transaction, you knew that that was in violation 18 of the Court's order, right? 19 A I did, yes. 20 Q Okay. 02:59:16 21 And you did it anyway? 22 A I did it because I was incapacitated, and I 23 wanted to make these assets more accessible. 24 Q So what did you do with those assets after 25 they went into your Bitcoin account -- after they 02:59:28 Page 106</p>	<p>1 Q Okay. 2 So your testimony is you were incapacitated, 3 you executed two transactions of 50 Bitcoin each, 4 and when you realized what happened, you transferred 5 them back to the Ledger wallet? 03:01:05 6 That's what you are saying? 7 A That is correct. 8 MR. GRIVNER: Objection to form. 9 MR. EVANS: Okay. 10 Let's open up the Ledger Live operations 03:01:10 11 wallet, Sam. And the exhibit letter, if you could. 12 COURT REPORTER: Mr. Evans, if you could just 13 slow down a little bit. You get talking pretty fast 14 sometimes. It's hard to understand you. 15 MR. EVANS: Sure. 03:01:30 16 MR. ASHWORTH: This is going to be Exhibit I, 17 Joe. 18 (Exhibit I was marked for 19 identification and is attached 20 hereto.) 03:01:38 21 BY MR. EVANS: 22 Q So this is Exhibit I. This is the Ledger 23 Live operations document that was provided to us by 24 you concerning your Ledger wallets. 25 MR. EVANS: So if you would go to Line 03:01:48 Page 108</p>
<p>1 went into your Coinbase account? Apologies. 2 A In both cases on the 16th and 17th, they were 3 liquidated for dollars. And when -- when I became 4 aware of those transactions and I swepted the assets 5 back to the hardware wallet where they were -- where 02:59:46 6 they were supposed to be, and then transferred them 7 subsequently to the debtor. 8 Q Let -- let -- let's take that in pieces. 9 What do you mean, when you became aware of 10 the transactions? 03:00:02 11 A Well, I was incapacitated, as I said, and so 12 I -- I -- I -- when I got better and I -- I didn't 13 think I was dying, I stopped the transfer of assets 14 from the Ledger wallet to the Coinbase account and 15 eventually reversed that transaction, put the assets 03:00:24 16 back on the hardware wallet where they -- where -- 17 where they were supposed to be. 18 Q Okay. 19 So when you became aware, you're saying you 20 don't remember transferring the January -- doing -- 03:00:38 21 executing the January 16th and January 17th Bitcoin 22 transactions? 23 A I was -- I was completely incapacitated. 24 I -- that's all I can tell you. And in the -- you 25 know, in my delirium, that seemed to make sense. 03:00:50 Page 107</p>	<p>1 Item 66, Sam. You might want to highlight that. 2 BY MR. EVANS: 3 Q Line Item 66 is a January 16th, 2021 Bitcoin 4 transaction, 50.00014 Bitcoin. 5 Do you see that? 03:02:04 6 A Yes. 7 Q Okay. 8 And January 17th, the next day, is the 9 Bitcoin transaction 50.00027. 10 Do you see that? 03:02:15 11 A Uh-huh. Yes. 12 Q Okay. 13 And are those the two transactions that you 14 were talking about where you were incapacitated and 15 you don't remember doing? 03:02:24 16 A Yes. I scheduled those transactions, and 17 they were executed, yes. 18 Q Okay. 19 So this is your digital wallet. You said 20 you -- you placed them all back into your digital 03:02:30 21 wallet. So where is that? 22 A No. I transferred the -- I don't see that on 23 here. Why -- where are the dates? Dates -- the 24 dates seem like they are out of order here. I -- is 25 there any way to sort this by date? 03:03:07 Page 109</p>

28 (Pages 106 - 109)

<p>1 I mean, the answer to the question is I</p> <p>2 transferred the assets out of the digital wallet to</p> <p>3 Coinbase for the reasons I've explained, and then I</p> <p>4 transferred the proceeds of -- of that liquidation</p> <p>5 back to the hardware wallet and transferred it to 03:03:29</p> <p>6 the debtor. That's my -- that's my recollection.</p> <p>7 Q On February 5th, 2021, you recall a lot of</p> <p>8 the people in this deposition, we were on a Zoom</p> <p>9 call just like this, and you transferred Bitcoin and</p> <p>10 other assets back to the debtor? 03:03:46</p> <p>11 Okay?</p> <p>12 A Yes.</p> <p>13 Q Do you remember that?</p> <p>14 A Yes.</p> <p>15 Q Okay. 03:03:49</p> <p>16 And you transferred 49.98823 Bitcoin back to</p> <p>17 the debtor, right?</p> <p>18 A Yes.</p> <p>19 Q Okay.</p> <p>20 And if you go up to Line Item 63, you will 03:03:57</p> <p>21 see an out, 49.98823, and that's from you to the</p> <p>22 debtor, right?</p> <p>23 A Yes.</p> <p>24 Q Okay.</p> <p>25 But there were 150 Bitcoin in this account 03:04:10</p> <p style="text-align: right;">Page 110</p>	<p>1 BY MR. EVANS:</p> <p>2 Q So this is Exhibit J. This is your Coinbase</p> <p>3 account. And it appears that there are liquidations</p> <p>4 of Bitcoin -- well, conversions of Bitcoin on 1.6 --</p> <p>5 on January 16th and January 17th. Sorry. 03:05:54</p> <p>6 January 17th and January 17th.</p> <p>7 Do you see that?</p> <p>8 A Yeah. Can you repeat the numbers? Yeah, 50</p> <p>9 Bitcoin sold, and the proceed numbers are there,</p> <p>10 yeah. 03:06:09</p> <p>11 Q Okay.</p> <p>12 And what was the proceeds of the first</p> <p>13 transaction?</p> <p>14 A Which one do you mean, the first transaction?</p> <p>15 Q The first one on the list, the second 03:06:17</p> <p>16 transaction down.</p> <p>17 A Can you hover over it? I'm not sure which</p> <p>18 direction you're going in, up or down.</p> <p>19 MR. EVANS: It's the first one, Sam, with the</p> <p>20 stock price of 35386.17. 03:06:31</p> <p>21 THE DEPONENT: Okay.</p> <p>22 Do you want me to read a number from this</p> <p>23 screen?</p> <p>24 BY MR. EVANS:</p> <p>25 Q Yes. What were the proceeds of that 03:06:39</p> <p style="text-align: right;">Page 112</p>
<p>1 before you transferred the 250 Bitcoin transactions</p> <p>2 out, right?</p> <p>3 A Yes, that's correct.</p> <p>4 Q Okay.</p> <p>5 And so where is the other hundred? 03:04:20</p> <p>6 A The other hundred were liquidated, and the</p> <p>7 proceeds available to transfer back were sent back</p> <p>8 to the hardware wallet in the form of USDC.</p> <p>9 Q And did you execute these transact- -- where</p> <p>10 did you execute the transactions to convert them 03:04:44</p> <p>11 into USDC?</p> <p>12 A Can you repeat?</p> <p>13 Q You said you converted the Bitcoin into USDC.</p> <p>14 Where did you do that?</p> <p>15 A On -- on Coinbase. 03:04:58</p> <p>16 Q Coinbase.</p> <p>17 A You should have a record of those</p> <p>18 transactions.</p> <p>19 Q Uh-huh.</p> <p>20 MR. EVANS: Sam, can you pull up Coinbase 2? 03:05:09</p> <p>21 Can we get a letter for this one, Sam?</p> <p>22 MR. ASWORTH: This will be Exhibit J.</p> <p>23 (Exhibit J was marked for</p> <p>24 identification and is attached</p> <p>25 hereto.) 03:05:46</p> <p style="text-align: right;">Page 111</p>	<p>1 transaction?</p> <p>2 A \$1,742,946.</p> <p>3 Q Okay.</p> <p>4 And what about the next transaction, the next</p> <p>5 sale? 03:06:57</p> <p>6 A Can you hover? Can you hover over the</p> <p>7 transaction that you are referring to, please, or</p> <p>8 give me some other reference?</p> <p>9 MR. EVANS: Sam, could you hover over that</p> <p>10 fourth line? 03:07:22</p> <p>11 THE DEPONENT: \$1,695,010.50.</p> <p>12 BY MR. EVANS:</p> <p>13 Q Okay.</p> <p>14 And I'm not going to ask you to do the math,</p> <p>15 but I'm going to represent to you that the total of 03:07:34</p> <p>16 those transactions is \$3,437,956.53.</p> <p>17 Okay?</p> <p>18 You can presume that that's -- that's true.</p> <p>19 MR. EVANS: So, Sam, if you can go back to</p> <p>20 the Ledger Live operations. 03:07:51</p> <p>21 BY MR. EVANS:</p> <p>22 Q Mr. Alexander, on February 5th, 2021, where</p> <p>23 you transferred the debtor some assets, you did not</p> <p>24 transfer the debtors \$3,437,956.53 in cash, did you?</p> <p>25 A I don't know. Do you have a -- a reference 03:08:08</p> <p style="text-align: right;">Page 113</p>

29 (Pages 110 - 113)


<p>1 in the -- in the log to the exact amount?</p> <p>2 Q Yes.</p> <p>3 MR. EVANS: Sam, can you refer him to the</p> <p>4 February 5th, 2021 transaction -- February 6th, 2021</p> <p>5 transaction. It's Line 51. 03:08:36</p> <p>6 BY MR. EVANS:</p> <p>7 Q Do you see that line, Mr. Alexander?</p> <p>8 A Do you guys mind if I take another break?</p> <p>9 Q If you just give me, like, three questions,</p> <p>10 we can take, like, a five-minute break. Is that all 03:09:03</p> <p>11 right?</p> <p>12 A As soon as possible. I'm -- I'm feeling a</p> <p>13 bit short of breath here.</p> <p>14 Q I'll -- I'll be -- I'll be very brief. All</p> <p>15 I'm asking you is, do you see this document reflects 03:09:14</p> <p>16 that there was a 2773488 transfer of USDC to the</p> <p>17 debtors?</p> <p>18 Do you see that?</p> <p>19 COURT REPORTER: To the what?</p> <p>20 MR. EVANS: To the debtors. 03:09:28</p> <p>21 THE DEPONENT: Yes, I see that.</p> <p>22 BY MR. EVANS:</p> <p>23 Q Okay.</p> <p>24 And USDC is a reference to UCD coin, right,</p> <p>25 Mr. Alexander? 03:09:42</p> <p style="text-align: right;">Page 114</p>	<p>1 the discovery that has up to now been asked for.</p> <p>2 And this issue is a -- has been ongoing. And</p> <p>3 I am, of course, committed to delivering all the</p> <p>4 assets I have of the debtors, but I -- I -- I can't</p> <p>5 answer that question today because I just don't know 03:11:36</p> <p>6 where we stand.</p> <p>7 Q Mr. Alexander, your lawyers didn't execute</p> <p>8 these transactions. You executed these</p> <p>9 transactions.</p> <p>10 Where is the 664,000? 03:11:44</p> <p>11 A That question remains open, and I can't</p> <p>12 answer it, as I have described.</p> <p>13 Q This was just a few weeks ago. You don't</p> <p>14 remember where \$664,467 went?</p> <p>15 A As I said, this -- that question remains 03:11:58</p> <p>16 open, and as far as I know, it hasn't been resolved</p> <p>17 yet as to exactly what the accounting is, whether --</p> <p>18 for example -- whether people agree on that number,</p> <p>19 and -- and so I can't answer that.</p> <p>20 Q It's not a legal question. The question is 03:12:16</p> <p>21 where the money is. So I'm not asking you to make a</p> <p>22 legal opinion or a legal determination or for</p> <p>23 counsel to have argument. I'm asking you where the</p> <p>24 money is. There is \$664,467.53 missing.</p> <p>25 Where is it? 03:12:31</p> <p style="text-align: right;">Page 116</p>
<p>1 A Yes, that's right.</p> <p>2 Q And each UCD coin is worth 1 USD; is that</p> <p>3 right?</p> <p>4 A Approximately.</p> <p>5 Q Okay. 03:09:49</p> <p>6 So the proceeds from the January 16th and</p> <p>7 January 17th Bitcoin transactions were 3,437,956.53.</p> <p>8 You provided the debtors with 2,773,488.</p> <p>9 Where are the additional \$664,467.53?</p> <p>10 A Yeah. This has been the subject of 03:10:19</p> <p>11 back-and-forth e-mails ongoing, and I don't -- I</p> <p>12 don't have a complete answer for you today.</p> <p>13 I believe it will be part of discovery part</p> <p>14 two, which -- which I -- so I would -- I have to</p> <p>15 defer that -- I have to defer that to -- to -- I 03:10:38</p> <p>16 believe I have to defer that.</p> <p>17 Q Let me understand. There is 664,000 missing,</p> <p>18 and you are saying it's in your personal accounts</p> <p>19 because that's what's coming in part two?</p> <p>20 A Well, I don't know. This has -- as I said, 03:10:57</p> <p>21 this has been the subject of an ongoing e-mail</p> <p>22 conversation between lawyers.</p> <p>23 And I don't know the current status of that</p> <p>24 conversation, but I -- I believe we will get to the</p> <p>25 bottom of it when we have more -- or -- or all of 03:11:12</p> <p style="text-align: right;">Page 115</p>	<p>1 A I can't answer that question because I don't</p> <p>2 know if the amount is correct, and I don't know what</p> <p>3 the accounting is for -- for -- for those assets.</p> <p>4 Q Okay.</p> <p>5 We looked at the Coinbase records, right? 03:12:42</p> <p>6 A Okay.</p> <p>7 Guys, I'm going to need a break. This is --</p> <p>8 you said a few questions, and now we're ten minutes</p> <p>9 into this and --</p> <p>10 Q Well, you're not answering the question. The 03:12:56</p> <p>11 question is, where is the 664,000?</p> <p>12 A I have answered the question to the best of</p> <p>13 my ability and recollection.</p> <p>14 Q You're not going to answer the question?</p> <p>15 A I have answered the question. 03:13:06</p> <p>16 Q It's -- it's a very -- it's a very specific</p> <p>17 question, and you are being very evasive.</p> <p>18 The question is, where is the missing</p> <p>19 \$664,457, and your answer is "I don't remember"?</p> <p>20 A I will answer that question when I'm able to 03:13:19</p> <p>21 answer it. It remains an open question because it's</p> <p>22 being debated by counsel and others now, so...</p> <p>23 Q It's a fact question. It's not a legal</p> <p>24 question. Where is the 664?</p> <p>25 MR. GRIVNER: And he has answered it to the 03:13:31</p> <p style="text-align: right;">Page 117</p>

<p>1 best of his ability given his knowledge, sitting 2 here today. And it's been asked multiple times now. 3 THE DEPONENT: Joe, I'm asking for a break, 4 and you're being really inhumane and not really 5 appreciating the state of my recovery, and I don't 03:13:45 6 appreciate it. 7 So I would ask that we maintain a cordial 8 contact here. I am doing the best job that I can to 9 support you in -- in -- in -- in your efforts, and I 10 would appreciate that you maintain some decorum 03:14:02 11 and -- and respect myself and the others on this 12 call. 13 MR. EVANS: If you want to take a break, 14 that's fine. This -- this question and the answers 15 that you have to give us are not going to go away, 03:14:14 16 so if you want to take five minutes, I'm happy to 17 give you five minutes, but there is missing money 18 here, and we need to know where it is. 19 MR. GRIVNER: Let's take the break that's 20 been requested, then. Five minutes. 03:14:26 21 THE VIDEOGRAPHER: Stand by, please, 22 Mr. Alexander. This marks the end of Media No. 7. 23 Going off the record at 3:14 p.m. 24 (Recess.) 25 THE VIDEOGRAPHER: We are back on the record 03:24:07 Page 118</p>	<p>1 I -- I am happy to confer further and consult 2 with Mr. Pfeiffer as well, as well as California 3 counsel regarding those positions. 4 But as of right now, I am instructing him not 5 to answer anything further, subject to further 03:26:12 6 conference regarding this change in circumstances, 7 yes. 8 MR. EVANS: Is it your position you are 9 directing your client not to comply with the Court's 10 order to sit for this deposition and provide 03:26:30 11 information that is required to be provided 12 tomorrow? 13 MR. GRIVNER: In light of his bankruptcy 14 filing, that is my position now. I am happy to 15 engage in a further conference regarding continuing 03:26:40 16 this -- this deposition after all relevant attorneys 17 and parties confer regarding the -- the state of the 18 law as -- as to those issues. 19 I would ask that this deposition at the very 20 least be adjourned until such conference can occur. 03:27:00 21 MR. EVANS: My request is for a -- I think 22 what we need to do here is have -- have a 15-minute 23 recess so I can confer with counsel and see how we 24 want to handle this. 25 This mid-deposition filing, it's pretty 03:27:19 Page 120</p>
<p>1 at 3:24 p.m. Pacific, and this marks the beginning 2 of Media No. 8 in the deposition of James Alexander. 3 You may proceed, Counsel. 4 MR. GRIVNER: Counsel, I've just been advised 5 that Mr. Alexander has filed for personal 03:24:55 6 bankruptcy. I'm forwarding everyone an e-mail 7 regarding that filing. And that's my understanding 8 as to what has occurred. 9 Our position in light of that filing is that 10 an automatic stay is in place such that this 03:25:10 11 deposition cannot go forward in light of that. 12 MR. EVANS: Where was this bankruptcy filing? 13 MR. GRIVNER: I'm forwarding it right now. 14 It was filed, and I'll tell you, in the Central 15 District of California. 03:25:28 16 MR. EVANS: So it's your position that based 17 on this filing, it supersedes the judge's emergency 18 order that permits this deposition? 19 MR. GRIVNER: I think an automatic stay is in 20 place in connection with Mr. Alexander's bankruptcy 03:25:46 21 filings, such that that is the case, yes. 22 MR. EVANS: So are you directing your client 23 not to answer any more questions today? 24 MR. GRIVNER: At this point, I'm directing 25 him not to answer any further questions. 03:25:58 Page 119</p>	<p>1 clearly an effort to obfuscate our fact-finding 2 efforts. We know what's going on here. And we're 3 asking difficult questions, and the second we do, 4 there's a personal bankruptcy filing to disrupt us 5 from doing that. 03:27:36 6 And so we're going to caucus internally and 7 decide how to proceed. If you are directing your 8 client to not comply with the Court's order, that's 9 on you, and we will have that accordingly. 10 I would ask for 15 minutes to talk among 03:27:48 11 counsel and to return on the record to give you our 12 position. 13 MR. GRIVNER: Understood. 14 We will do the same. 15 MR. LUFT: I will note that the deposition 03:27:56 16 remains ongoing, and as such, please don't confer 17 with your client. 18 MR. GRIVNER: Understood. 19 THE VIDEOGRAPHER: Stand by everyone, please. 20 I also can create breakout rooms, if you'd like. 03:28:08 21 I'm going to go off the record first. 22 MR. GRIVNER: No need for a breakout room, at 23 least on our side. 24 THE VIDEOGRAPHER: Thank you. 25 Stand by. I'm going to go off the record. 03:28:13 Page 121</p>

<p>1 Is that okay?</p> <p>2 MR. EVANS: Yes.</p> <p>3 THE VIDEOGRAPHER: Great.</p> <p>4 This marks the end of Media No. 8. Going off</p> <p>5 the record at 3:28 p.m. Pacific. 03:28:21</p> <p>6 (Recess.)</p> <p>7 THE VIDEOGRAPHER: We're back on the record</p> <p>8 at 4:00 o'clock p.m. Pacific, and this marks the</p> <p>9 beginning of Media No. 9 in the deposition of</p> <p>10 James Alexander. 04:00:46</p> <p>11 You can proceed, Counsel.</p> <p>12 MR. EVANS: Mr. Alexander, will you proceed</p> <p>13 with this deposition?</p> <p>14 MR. GRIVNER: Mr. Alexander, you can -- you</p> <p>15 can answer that question to the extent you're able 04:01:01</p> <p>16 to.</p> <p>17 THE DEPONENT: I've been advised by counsel</p> <p>18 not to continue this deposition.</p> <p>19 MR. EVANS: Counsel, are -- are you advising</p> <p>20 your client and directing him to not proceed with 04:01:15</p> <p>21 this deposition?</p> <p>22 MR. GRIVNER: Based upon my conversations</p> <p>23 with Mr. Alexander's California bankruptcy attorney,</p> <p>24 Mr. Golubchik, Mr. Golubchik is not advising -- is</p> <p>25 advising Mr. Alexander not to continue with this 04:01:30</p> <p style="text-align: right;">Page 122</p>	<p>1 MR. GRIVNER: Mr. Alexander's filing of his</p> <p>2 bankruptcy petition in California.</p> <p>3 MR. AZMAN: So it is your position that the</p> <p>4 automatic stay allows Mr. Alexander to no longer sit</p> <p>5 for a deposition in other pending litigation; is 04:02:42</p> <p>6 that correct?</p> <p>7 MR. GRIVNER: That's correct.</p> <p>8 MR. AZMAN: Thank you.</p> <p>9 MR. LUFT: Okay.</p> <p>10 Can I ask a couple follow-up questions just 04:02:53</p> <p>11 on this?</p> <p>12 MR. GRIVNER: To whom?</p> <p>13 MR. LUFT: There has been approximately</p> <p>14 \$170,000 of Cred Capital funds that have been</p> <p>15 identified during this deposition as not the 04:03:04</p> <p>16 property of Mr. Alexander, but specifically the</p> <p>17 property of the Cred Capital. There is a pending</p> <p>18 order that those funds had to be turned over as of</p> <p>19 last Friday.</p> <p>20 Is Mr. Alexander refusing to turn over those 04:03:15</p> <p>21 funds, despite the fact that they are Cred Capital</p> <p>22 funds?</p> <p>23 MR. GRIVNER: I will advise -- I will confer</p> <p>24 with Mr. Alexander's team of counsel and respond</p> <p>25 back to that question as soon as possible. 04:03:25</p> <p style="text-align: right;">Page 124</p>
<p>1 deposition in light of the bankruptcy filing that</p> <p>2 has occurred in California.</p> <p>3 MR. LUFT: When did Mr. -- when did the</p> <p>4 bankruptcy counsel give Mr. Alexander that advice?</p> <p>5 Was it before this deposition or during it? 04:01:44</p> <p>6 MR. GRIVNER: It was during the deposition.</p> <p>7 It was during this break.</p> <p>8 MR. LUFT: So he communicated with</p> <p>9 Mr. Alexander during a pending deposition in -- in</p> <p>10 Delaware; is that correct? 04:01:51</p> <p>11 MR. GRIVNER: No. The advice was provided to</p> <p>12 me by Mr. Golubchik, and I have advised</p> <p>13 Mr. Alexander, in light of the advice given by</p> <p>14 Mr. Golubchik, to not -- not continue with this</p> <p>15 deposition. 04:02:07</p> <p>16 I will further represent that I have had --</p> <p>17 neither me, nor Mr. Pfeiffer, have had any</p> <p>18 communications with Mr. Golubchik prior to this --</p> <p>19 the communications that we had with him during this</p> <p>20 break. 04:02:25</p> <p>21 MR. AZMAN: Can you articulate --</p> <p>22 MR. GRIVNER: Just so I'm clear --</p> <p>23 MR. AZMAN: Can you articulate the legal</p> <p>24 basis for why you are directing him not to continue</p> <p>25 with the deposition specifically? 04:02:32</p> <p style="text-align: right;">Page 123</p>	<p>1 MR. LUFT: Okay.</p> <p>2 And --</p> <p>3 MR. WALSH: Well, this is Tim.</p> <p>4 What is as soon as possible?</p> <p>5 I sent the e-mail, like, an hour-and-a-half 04:03:37</p> <p>6 ago, maybe two hours ago. So what is as soon as</p> <p>7 possible?</p> <p>8 I mean, he has got \$60,000 sitting in the</p> <p>9 trunk of a car. No one can think that's prudent.</p> <p>10 MR. GRIVNER: I -- I understand your 04:03:49</p> <p>11 position. We will respond back as soon as possible.</p> <p>12 I will -- I will make every effort to respond as</p> <p>13 quickly as possible after I have conferred with</p> <p>14 counsel for Mr. Alexander that I was not even -- you</p> <p>15 know, his -- his existence I was not even aware of 04:04:03</p> <p>16 before about 35 minutes ago.</p> <p>17 MR. WALSH: I appreciate that.</p> <p>18 Can you give me a time frame, please? We are</p> <p>19 going to contact chambers.</p> <p>20 MR. GRIVNER: We -- I will give you a 04:04:19</p> <p>21 time -- let me reach out to Mr. Golubchik, and I</p> <p>22 will give you a time frame within the next hour.</p> <p>23 And -- and I hope that -- I hope for that to be --</p> <p>24 that answer to be this evening.</p> <p>25 MR. LUFT: Mr. Grivner, I appreciate your 04:04:36</p> <p style="text-align: right;">Page 125</p>

<p>1 position. We are not aware any of precedent that</p> <p>2 indicates that Mr. Alexander's personal bankruptcy</p> <p>3 filing prevents the continuation of this deposition.</p> <p>4 Accordingly, we are not going to suspend the</p> <p>5 deposition which has been Court ordered. 04:04:51</p> <p>6 MR. GRIVNER: Uh-huh.</p> <p>7 MR. LUFT: It's going to stay pending.</p> <p>8 If Mr. Golubchik wants to provide us with</p> <p>9 such precedent, I ask him to do so now.</p> <p>10 MR. GRIVNER: Uh-huh. 04:05:01</p> <p>11 MR. LUFT: Otherwise, we're going to have --</p> <p>12 I am going to ask that we continue on with this</p> <p>13 deposition as the Court ordered it.</p> <p>14 MR. GRIVNER: And his instruction is for him</p> <p>15 not to answer right now. And we will -- I will 04:05:11</p> <p>16 relay that -- that message and ask that his position</p> <p>17 and support be provided, and -- and we will go from</p> <p>18 there.</p> <p>19 MR. LUFT: Okay. I think we're going to need</p> <p>20 to go to the Court. I -- I -- I don't know how else 04:05:26</p> <p>21 to -- I don't know why Mr. Golubchik is not on this</p> <p>22 call, to be honest with you right now, if he's the</p> <p>23 one --</p> <p>24 I understand the tough position you are in,</p> <p>25 Mr. Grivner, but, you know, honestly, if he's giving 04:05:38</p> <p style="text-align: right;">Page 126</p>	<p>1 THE VIDEOGRAPHER: Stand by, everyone. This</p> <p>2 marks the end of Media No. 9. Going off the record</p> <p>3 at 4:06 p.m. Pacific.</p> <p>4 (Recess.)</p> <p>5 THE VIDEOGRAPHER: We are back on the record 04:27:03</p> <p>6 at 4:28 p.m. Pacific, and this marks the beginning</p> <p>7 of Media No. 10 in the deposition of James</p> <p>8 Alexander.</p> <p>9 Due to certain circumstances, the</p> <p>10 videographer is using his video as a placeholder. 04:28:27</p> <p>11 You may proceed, Counsel.</p> <p>12 MR. EVANS: We are here to depose James</p> <p>13 Alexander pursuant to an emergency order issued by</p> <p>14 the Court on February 5th, 2021.</p> <p>15 We have been advised by counsel that 04:28:41</p> <p>16 Mr. Alexander filed for personal bankruptcy during</p> <p>17 the pendency of the deposition during a break, in</p> <p>18 which he claimed he was having some issues.</p> <p>19 I understand that counsel is advising him to</p> <p>20 not proceed with this deposition. We think that's 04:28:58</p> <p>21 improper, but we're here, ready, willing, and able</p> <p>22 and want to proceed with this deposition, and it</p> <p>23 should proceed.</p> <p>24 So if Mr. Grivner has an opposition to</p> <p>25 proceeding with the Court-ordered deposition, we 04:29:07</p> <p style="text-align: right;">Page 128</p>
<p>1 directions to counsel -- he's getting instructions</p> <p>2 from counsel who no one's ever seen.</p> <p>3 MR. GRIVNER: I -- I understand your</p> <p>4 position. I will relay that message, and</p> <p>5 Mr. Golubchik will participate to the extent he 04:05:56</p> <p>6 feels necessary.</p> <p>7 MR. WALSH: Let's do this. Let's go off the</p> <p>8 record for 15 minutes. We'll come back.</p> <p>9 We are going to get in touch with chambers.</p> <p>10 MR. GRIVNER: Well, get -- get in touch with 04:06:08</p> <p>11 chambers? I don't know why we need to get back on</p> <p>12 the record for this deposition.</p> <p>13 MR. LUFT: It's not suspended.</p> <p>14 MR. GRIVNER: You can suspended it until we</p> <p>15 are ordered to reopen it. We're not going to agree 04:06:19</p> <p>16 to continue it, unless the Court orders us to do so.</p> <p>17 MR. WALSH: Which is why we are going to try</p> <p>18 to get the Court right now.</p> <p>19 MR. GRIVNER: Okay.</p> <p>20 MR. WALSH: See you in 15 minutes. 04:06:30</p> <p>21 THE VIDEOGRAPHER: I'm going to go off the</p> <p>22 record.</p> <p>23 Is that okay, Counsel?</p> <p>24 MR. WALSH: Yes, that's fine.</p> <p>25 MR. GRIVNER: Yes. 04:06:36</p> <p style="text-align: right;">Page 127</p>	<p>1 would like to hear that now.</p> <p>2 MR. GRIVNER: Yes. This is Mr. Grivner.</p> <p>3 Based upon our -- our conference with</p> <p>4 Mr. Alexander's California bankruptcy attorney, he</p> <p>5 is being instructed not to continue with this 04:29:21</p> <p>6 deposition.</p> <p>7 We have heard that the Court will not be able</p> <p>8 to hear -- the Delaware court will not be able to</p> <p>9 hear us this evening regarding that.</p> <p>10 We will be available at the convenience of 04:29:32</p> <p>11 the Court.</p> <p>12 MR. EVANS: Just to be clear, the -- the</p> <p>13 Committee -- let me speak for the debtors. We are</p> <p>14 not agreeing to extend this deposition or to close</p> <p>15 this deposition. The deposition is open, and 04:29:44</p> <p>16 Mr. Alexander should be answering the questions that</p> <p>17 the Court required him to answer. And he should</p> <p>18 know that under Delaware law, he shouldn't be</p> <p>19 consulting his -- his attorneys in the meantime.</p> <p>20 MR. GRIVNER: And -- and we have no -- no 04:29:56</p> <p>21 objection to that fact. This deposition will remain</p> <p>22 open, unless and until the Court orders it to be</p> <p>23 closed or otherwise.</p> <p>24 MR. LUFT: And, Mr. Grivner, will</p> <p>25 Mr. Alexander be available tomorrow morning for the 04:30:14</p> <p style="text-align: right;">Page 129</p>

<p>1 Court?</p> <p>2 MR. GRIVNER: For the Court?</p> <p>3 MR. LUFT: Yes. If we proceed with -- if the</p> <p>4 Court needs Mr. Alexander to appear in front of it,</p> <p>5 will Mr. Alexander be -- make himself available for 04:30:23</p> <p>6 that?</p> <p>7 MR. GRIVNER: I will have to confer with --</p> <p>8 with him regarding his availability. I don't know</p> <p>9 that -- for the purposes of our conference with the</p> <p>10 Court, I don't know that he would be needed to 04:30:34</p> <p>11 testify.</p> <p>12 If you are looking to call him as a witness</p> <p>13 in some sort of hearing with the Court tomorrow,</p> <p>14 please -- please let us know that, and I will</p> <p>15 determine and let you know as -- as soon as possible 04:30:48</p> <p>16 whether or not he would be available.</p> <p>17 But it would seem to me that -- that -- that</p> <p>18 any hearing conducted before the Court tomorrow</p> <p>19 would not be evidentiary in nature. If -- if that</p> <p>20 is -- if -- if you feel otherwise, please let me 04:31:05</p> <p>21 know, and I will advise as to his availability.</p> <p>22 MR. LUFT: Thank you.</p> <p>23 Similarly, Mr. Grivner, as we believe this</p> <p>24 deposition should continue on now and going forward,</p> <p>25 we request that Mr. Alexander make sure that should 04:31:19</p> <p style="text-align: right;">Page 130</p>	<p>1 himself all out of the Cred Capital bank account.</p> <p>2 This was all done after Mr. Alexander</p> <p>3 attended the hearing on February 3rd where he was</p> <p>4 made aware that this motion was going to be filed.</p> <p>5 The motion was filed during the pendency of that 04:32:48</p> <p>6 hearing.</p> <p>7 Is Mr. Alexander returning that \$170,000</p> <p>8 tonight?</p> <p>9 MR. GRIVNER: I will confer with my client</p> <p>10 and his various counsel and report back to you 04:32:57</p> <p>11 regarding his position on -- on those facts.</p> <p>12 MR. EVANS: What about the \$648,000 missing</p> <p>13 from the January 16 and January 17 Bitcoin</p> <p>14 transactions?</p> <p>15 MR. GRIVNER: I will confer with my 04:33:10</p> <p>16 counsel -- with my counsel -- with Mr. Alexander's</p> <p>17 various counsel on those facts and report back to</p> <p>18 you as well.</p> <p>19 MR. EVANS: Will we have an answer by this</p> <p>20 evening? 04:33:25</p> <p>21 MR. GRIVNER: I will provide an answer as</p> <p>22 soon as it can be available.</p> <p>23 MR. WALSH: Okay. Mr. Grivner, it's Tim Walsh</p> <p>24 on behalf of the Committee. In the interim, please</p> <p>25 do your best to ensure that your client safeguards 04:33:42</p> <p style="text-align: right;">Page 132</p>
<p>1 the Court rule that he has to continue -- that he</p> <p>2 has to continue with this deposition, that he make</p> <p>3 himself available tomorrow morning Eastern Time to</p> <p>4 go ahead with it.</p> <p>5 MR. GRIVNER: And -- and I understand that 04:31:31</p> <p>6 request. I have not consulted with him regarding</p> <p>7 his availability, but I will -- I understand the</p> <p>8 request, and I understand the urgency of -- of the</p> <p>9 issues at hand, and I will ask that he make every</p> <p>10 possible availability -- make him available at every 04:31:44</p> <p>11 possibility to -- to adhere to that.</p> <p>12 MR. LUFT: And, finally, I would just note</p> <p>13 for the record, Mr. Grivner and Mr. Alexander should</p> <p>14 be made aware that he is currently ordered to appear</p> <p>15 for this deposition, and in our view, he is -- he is 04:31:59</p> <p>16 in violation of that order.</p> <p>17 MR. GRIVNER: And -- and I -- I will note for</p> <p>18 the record that the position is that the automatic</p> <p>19 stay as it relates to the California bankruptcy</p> <p>20 filing impacts that order. 04:32:15</p> <p>21 MR. EVANS: Mr. Grivner, one more thing.</p> <p>22 Mr. Alexander admitted on the record to have</p> <p>23 withdrawn \$60,000 in cash, which apparently is</p> <p>24 sitting in the trunk of his vehicle. He transferred</p> <p>25 \$100,000 to himself and apparently wrote a check to 04:32:35</p> <p style="text-align: right;">Page 131</p>	<p>1 the property of the debtors' estate, especially the</p> <p>2 \$60,000 in cash that's sitting in the back of his</p> <p>3 car.</p> <p>4 MR. GRIVNER: Understood.</p> <p>5 MR. WALSH: Thank you. 04:33:55</p> <p>6 THE VIDEOGRAPHER: Is there anything else we</p> <p>7 need to put on the record either from the reporter</p> <p>8 or any other counsel before I conclude today's</p> <p>9 deposition?</p> <p>10 MR. LUFT: We're not concluding the 04:34:07</p> <p>11 deposition. You can adjourn the deposition, but it</p> <p>12 remains open.</p> <p>13 MR. EVANS: Correct.</p> <p>14 COURT REPORTER: Okay. Would any counsel</p> <p>15 like to order the deposition transcript? 04:34:13</p> <p>16 MR. EVANS: Yes.</p> <p>17 MR. LUFT: Yes. We'd like it expedited, yes.</p> <p>18 Mr. Luft and Mr. Evans both would order it.</p> <p>19 We would both like it expedited, and I would like a</p> <p>20 rough as well. 04:34:30</p> <p>21 COURT REPORTER: Mr. Walsh, do you need a</p> <p>22 copy?</p> <p>23 MR. WALSH: No. Mr. Evans is with me. Thank</p> <p>24 you.</p> <p>25 COURT REPORTER: And Grogan? 04:34:44</p> <p style="text-align: right;">Page 133</p>

<p>1 MR. LUFT: Mr. Grogan is with me.</p> <p>2 COURT REPORTER: Okay.</p> <p>3 MR. GROGAN: Yeah. Mr. Luft has got me</p> <p>4 covered. Thank you.</p> <p>5 COURT REPORTER: Okay.</p> <p>6 MR. GRIVNER: And I would like it as well.</p> <p>7 COURT REPORTER: Grivner?</p> <p>8 MR. GRIVNER: Correct.</p> <p>9 COURT REPORTER: Okay. I'm going to see if I</p> <p>10 can have this for you tomorrow, if I can. And if I 04:35:09</p> <p>11 can't, it will be the next day. How's that?</p> <p>12 Does that work for you all with the expedite?</p> <p>13 MR. LUFT: I think if we could get a rough as</p> <p>14 soon as possible, that would be great, and given</p> <p>15 that we are going to be in front of the Court, it 04:35:13</p> <p>16 would be, I think, really important if we could try</p> <p>17 to get it for tomorrow.</p> <p>18 COURT REPORTER: Try to get it for tomorrow?</p> <p>19 What?</p> <p>20 MR. LUFT: I am of the view that we really 04:35:23</p> <p>21 need it for tomorrow. I don't know if others feel</p> <p>22 differently, but --</p> <p>23 MR. EVAN: I am of the same view.</p> <p>24 COURT REPORTER: Wait. Do you need a final</p> <p>25 tomorrow? That's what I'm trying to find out.</p> <p>Page 134</p>	<p>1 I, JAMES ALEXANDER, do hereby declare under</p> <p>2 penalty of perjury that I have read the foregoing</p> <p>3 transcript; that I have made any corrections as</p> <p>4 appear noted, in ink, initialed by me, or attached</p> <p>5 hereto; that my testimony as contained herein, as</p> <p>6 corrected, is true and correct.</p> <p>7 EXECUTED this ____ day of _____,</p> <p>8 _____, at _____, _____.</p> <p>9 (City) (State)</p> <p>11</p> <p>12</p> <p>13</p> <p>14 _____</p> <p>15 JAMES ALEXANDER</p> <p>16 VOLUME I</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 136</p>
<p>1 MR. LUFT: Yes. If possible, we need a final</p> <p>2 for tomorrow.</p> <p>3 COURT REPORTER: Okay. I will endeavor to</p> <p>4 get that done.</p> <p>5 THE VIDEOGRAPHER: Okay. Are we okay to 04:35:44</p> <p>6 adjourn for today?</p> <p>7 MR. GRIVNER: That's fine.</p> <p>8 THE VIDEOGRAPHER: Thank you. We are</p> <p>9 adjourning today's deposition at 4:35 p.m. Off the</p> <p>10 record -- excuse me. Going off the record at 04:35:56</p> <p>11 4:35 p.m. The total number of media used was ten.</p> <p>12 (Whereupon the deposition was</p> <p>13 adjourned at 4:35 p.m.)</p> <p>14 ///</p> <p>15 ///</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 135</p>	<p>1 I, the undersigned, a Certified Shorthand</p> <p>2 Reporter of the State of California, Registered</p> <p>3 Professional Reporter, Certified Live Note Reporter,</p> <p>4 do hereby certify:</p> <p>5 That the foregoing proceedings were taken</p> <p>6 before me at the time and place herein set forth;</p> <p>7 that any witnesses in the foregoing proceedings,</p> <p>8 prior to testifying, were duly sworn; that a record</p> <p>9 of the proceedings was made by me using machine</p> <p>10 shorthand which was thereafter transcribed under my</p> <p>11 direction; that the foregoing transcript is a true</p> <p>12 record of the testimony given.</p> <p>13 Further, that if the foregoing pertains to</p> <p>14 the original transcript of a deposition in a Federal</p> <p>15 Case, before completion of the proceedings, review</p> <p>16 of the transcript [] was [] was not requested.</p> <p>17 I further certify I am neither financially</p> <p>18 interested in the action nor a relative or employee</p> <p>19 of any attorney or party to this action.</p> <p>20 IN WITNESS WHEREOF, I have this date</p> <p>21 subscribed my name.</p> <p>22 Dated: February 10, 2021</p> <p>23</p> <p>24  MELISSA M. VILLAGRAN</p> <p>25 CSR No. 12543 RPR</p> <p>Page 137</p>

35 (Pages 134 - 137)

[& - 3,437,956.53]

&	1313 5:7	99:5	56:21,23 57:17
	13535 14:2	2	58:23 59:10,14
& 5:14 10:12,16 50:16	137 1:25	2 13:12 111:20	61:16 62:11,14
1	15 88:23 120:22	2,773,488 115:8	63:12 104:24
1 1:25 9:17 13:7	121:10 127:8,20	20 20:22	105:2,20 106:11
34:19 74:2 81:2	150 110:25	20,000 61:6	109:3 110:7
90:14,25 93:2	1521 4:6	20-12836 1:11	113:22 114:4,4
115:2	15th 62:11,13 89:1	2:11 9:21	128:14 137:22
1,695,010.50.	16 105:2,17 132:13	20-51006 9:22	21 54:2
113:11	16th 3:7 29:17	200,000 72:13 73:4	212.547.5400 5:22
1,742,946 113:2	79:12,17 83:10,23	76:10 80:10	213.683.6105 3:19
1.260. 16:11	87:9 89:2 91:11	2000 21:19	215.665.3921 3:9
1.6 112:4	92:14 93:10 95:3	20005 4:14	21st 57:17 59:10
10 74:23 128:7	95:12 100:12	2010 21:19	59:14
137:22	104:24 105:20	2013 23:2	224.899 78:6
10,000 47:22 48:16	107:2,21 109:3	2014 46:22	225 68:11 69:13
48:25 49:14,20	112:5 115:6	2015 23:3,17 24:3	72:13 73:3 75:19
54:18 100:8,9	17 91:16 106:11	2016 23:10,11	76:9 78:14,23
100 102:24	132:13	2018 19:18 23:18	81:20 83:21
100,000 42:14,17	170,000 54:16	24:4,13 26:17,18	22nd 97:9 98:8
43:1,3,17 49:12	124:14 132:7	33:15 74:16,19,22	101:21 103:2,12
131:25	17th 29:17 79:23	202.536.1700 4:15	103:16 104:11
10173-1922 5:21	85:20 86:8 91:12	2020 8:5 19:8,11	24 70:14
102 8:8	91:13 92:14 107:2	25:3 35:20 36:20	24th 72:3 75:2
108 8:10	107:21 109:8	36:23 37:3,3,8,10	25 3:17
11 7:6	112:5,6,6 115:7	37:17,19 47:2	250 111:1
11,090 62:13	18 15:16	53:13,15,24 65:19	25th 74:22
111 8:12	19102 3:8	65:23 68:10 70:15	26 82:22
11th 102:22	19801 5:8	72:3 73:2 74:19	26th 79:3
12543 1:22 2:23	19803 4:7	75:2 78:5,8,23	2773488 114:16
137:25	1990 21:4	79:12,17,23 81:8	27th 58:9,10,23
12:07 2:20 9:2,5	1992 21:5	81:14 82:1,21,22	28th 56:21,23
12:12 13:8	1993 21:8	83:2,10 86:9	2:00 86:9
12:14 13:11	1996 21:9	88:23 89:1,2	2:12 89:21
12:20 18:2	19th 63:12	91:11,12,17 92:14	2:38 89:24
12:25 18:5	1:07 38:14	95:22 96:22,23	3
12:41 32:17	1:41 66:24	2020731 96:13	3 11:4 18:6 32:16
12:48 32:20	1:44 67:2	2021 1:17 2:21	67:22
12:56 38:11	1st 35:18,20 78:5,8	7:13 9:1,6 39:12	3,437,956.53
	78:23 81:8,14,25	42:7,12 43:18,24	113:24
	82:21 83:2 96:22	47:21 54:3,7	

[3,437,956.53. - account]

3,437,956.53. 113:16	4:35 2:20 135:9,11 135:13	56:11 125:8 131:23 133:2	94301 15:1
3.437956.53. 115:7	4:52 39:2	600 4:13	95 8:5
30 20:23	4:53 39:10	601 4:13	9th 9:6
300 82:4	4th 42:12 43:18,24 49:13,14 65:19	62 7:13 95:4	a
302.549.0186 4:8	5	63 110:20	ability 30:16,24 40:14 41:14 117:13 118:1
302.573.6277 5:9	5 38:15 66:23 70:10,25 71:1,3,4 71:10	648,000 132:12	able 33:2 51:23 52:17,18 71:20 88:6 117:20 122:15 128:21 129:7,8
30th 82:25	50 3:7 104:23 105:1,16 106:12 108:3 112:8	65 80:9 83:10,17 83:20,23 84:1 86:13 87:7 94:19	absolutely 66:3 96:8 101:8,15
31 7:13 8:5	50.00014 109:4	66 109:1,3	access 21:2 31:5,7 31:16,17 33:3,6 34:8 36:15 73:19 84:16 105:13
31st 95:21 96:12 96:23	50.00027. 109:9	664 117:24	accessed 106:5
3200 3:7	500,000 97:10 98:8 99:13 103:1,12,16 104:5	664,000 115:17 116:10 117:11	accessible 105:5,5 105:10 106:23
340 5:20	500,430.80 94:15 100:4	664,457 117:19	account 7:11 8:6,8 8:12 40:25 41:5 41:12,22,23,23 42:5 43:1,2,12,15 43:18,18,20 44:24 45:7,17,20 46:25 49:25 50:3,5,7 51:8,10,17,22 52:3 52:6,9,22,22,23,25 54:17 55:4,5,18,19 55:25 66:1 67:17 72:18 73:21 75:4 75:7,24 76:2 81:16,21,25 83:17 83:25 84:3,5,13,16 86:14,15 91:25 93:15 94:9 95:16 95:21 96:2,5,6 97:2,10,15,18,22 97:25 98:5,5,9,23
35 125:16	508,000 100:1	664,467 116:14	
350,000 56:23 58:3 58:18,21 61:2	51 114:5	664,467.53 115:9 116:24	
35386.17. 112:20	515 3:17	68 7:16	
3551 14:7	56 87:18 93:23 94:14 100:1	69 7:18	
3:14 118:23	59 94:18	6th 67:22 114:4	
3:24 119:1	5:35 89:10,18	7	
3:28 122:5	5th 110:7 113:22 114:4 128:14	7 89:25 118:22	
3rd 39:12 40:21 47:21 132:3	6	7131 137:23	
4	6 14:16 67:3 89:21	74 7:20	
4 32:21 35:4 38:10 65:23 70:25	6,225.26 63:13 65:11	75 84:19	
4.9. 94:21	60 80:9	7th 33:14 42:7	
4.96 93:20	60,000 43:25 44:24 45:6,16,19 46:24 47:11 49:13 50:12 50:24 51:4,9,16,19 52:2,3,6,25 55:3 55:15,19,24 56:9	8	
4051 14:15		8 97:7,9 101:19 119:2 122:4	
42 7:11		85 7:22	
427 14:25		9	
4455511 1:23		9 1:17 2:21 9:1 122:9 128:2	
45 38:25 39:4,9		90027 14:17	
45,000 100:8		90071 3:18	
4501 46:18		91423 14:4,8	
49.98823 110:16 110:21		9235 99:9	
4:00 122:8		9285 41:24	
4:06 128:3			
4:28 128:6			

[account - answer]

99:1,3,6,9,10,12 101:22 102:4,24 103:2,3,7,14,17,18 104:2,6,7,12 105:11,13,17 106:25 107:1,14 110:25 112:3 132:1 accounting 116:17 117:3 accounts 41:7,15 41:15,17 48:10 55:1 77:14,17 81:18 92:5 100:25 101:6 104:3 115:18 accurate 93:16 accurately 33:5 34:8 acquired 21:11,17 acquirer 21:12 act 54:24 action 10:4 87:11 137:18,19 actions 69:6 79:10 actively 34:22 activities 36:19 37:2,13,18 activity 34:22 73:17 add 31:20 additional 35:1 106:12 115:9 address 13:24,25 13:25 14:2,7,10,13 14:15,18,23,25 15:19 46:17 72:19 72:20 76:11 addresses 91:3,19 adequate 82:16,17	adhere 131:11 adjourn 133:11 135:6 adjourned 120:20 135:13 adjourning 135:9 administered 9:22 18:20 admit 43:11 admitted 131:22 adobe 96:14 advance 66:15 adversary 9:22 advice 43:5,9 54:20 123:4,11,13 advise 124:23 130:21 advised 119:4 122:17 123:12 128:15 advising 122:19 122:24,25 128:19 advisors 34:21 advisory 33:8,17 affiliate 24:19 affiliated 24:20,21 25:4,11 affiliation 25:6 affiliations 10:8 afternoon 9:4 11:8 11:9 age 15:15 agents 90:16 ago 16:10,12,14 20:22,23 23:20 51:23 56:9 69:20 87:25 116:13 125:6,6,16 agree 9:15 51:15 116:18 127:15	agreeable 39:1 agreed 13:5 agreeing 129:14 agreement 27:24 31:5,18 32:4,12 33:9,17 36:14 66:21 agreements 33:21 agricultural 67:11 ahead 38:19 45:14 48:20 131:4 al 1:5 2:5 9:19 alexander 1:12,15 2:12,18 7:4,16 9:18 10:17 11:8 12:19 13:12,15,16 13:20 15:10 18:6 18:10,19 21:14 30:10,14,18 31:2 32:21,24 37:25 38:9,16,19 41:8,8 41:17,18,23 42:5 42:14,20 43:2,12 43:19,20 45:4 47:23 62:5,15 67:3,6,21 68:10 70:2,8,17,21 74:13 74:18 85:18 87:24 88:13,22 89:25 90:8,23 91:4 92:20 93:9 96:3 96:21 98:20 99:10 99:10 102:2,18,18 103:8,8,9 113:22 114:7,25 116:7 118:22 119:2,5 122:10,12,14,25 123:4,9,13 124:4 124:16,20 125:14 128:8,13,16 129:16,25 130:4,5	130:25 131:13,22 132:2,7 136:1,15 alexander's 119:20 122:23 124:1,24 126:2 129:4 132:16 allow 29:24 allows 124:4 alma 14:25 alternative 21:20 21:23 22:1 alto 15:1 alyiah 15:10 amount 16:4 33:4 61:8 114:1 117:2 andrew 11:3 angeles 1:16 2:19 3:18 9:1 14:17 answer 8:23 11:17 11:21 12:22 20:4 20:7,19 25:8 27:18 28:9,15,16 29:9 30:4,20,23 31:4,13,15 32:2,9 33:5,25 34:7,7 40:14,19 42:24 45:12 46:10 49:18 50:6 54:15 56:5 56:12 75:12 76:7 77:8 78:1,2 80:6 84:9 92:18 94:2 95:8 98:3,6 99:18 100:14 101:2,3,11 104:17 110:1 115:12 116:5,12 116:19 117:1,14 117:19,20,21 119:23,25 120:5 122:15 125:24 126:15 129:17 132:19,21
---	--	--	--

[answered - back]

<p>answered 78:2 117:12,15,25 answering 30:14 117:10 129:16 answers 103:10 118:14 anybody 60:9 106:7 anyone's 60:11,16 anyway 105:25 106:1,21 apartment 14:16 apologies 56:7 107:1 apologize 89:10 91:12 96:10 apparently 43:2 131:23,25 appear 33:13 75:24 98:13 130:4 131:14 136:4 appearances 3:1 4:1 5:1 6:1 10:8 appearing 3:2 9:24 appears 83:16 93:13 94:18 95:3 112:3 application 29:14 57:19 appreciate 39:8 118:6,10 125:17 125:25 appreciating 118:5 appropriate 73:8 approximate 16:4 17:12,13 approximately 16:7 19:8 39:4 94:19 95:4 115:4</p>	<p>124:13 april 35:19 73:2 argument 116:23 articulate 123:21 123:23 ashworth 5:18 10:14 41:21 42:8 47:19 49:8 50:15 50:15,23 66:17,17 67:20 68:4 74:1,4 90:2,6 93:5 95:20 108:16 asked 30:18 45:12 57:10,11 58:18,21 59:1,4,13,22 68:20 69:1,12 70:10 75:2,18 76:1,9,13 77:6 87:24 101:7 101:9,14 106:7 116:1 118:2 asking 11:10 17:21 24:2 32:5 34:18 40:5 45:6,8 85:9 114:15 116:21,23 118:3 121:3 asset 36:1 69:8 assets 30:2,10 41:12 53:2 54:21 63:10 69:4,10 71:13 76:15 77:3 78:21 87:3 89:2 90:21 91:16 92:16 92:17 104:4 105:4 106:5,23,24 107:4 107:13,15 110:2 110:10 113:23 116:4 117:3 assist 34:25 35:4 associated 82:19</p>	<p>associates 21:21 21:23 22:1 assume 16:10 81:17 asworth 81:4 96:10,14,19 102:3 102:8 111:22 attached 42:2 62:2 68:2 69:16 74:6 85:15 95:24 102:11 108:19 111:24 136:4 attachment 31:6 attempt 77:2 attend 20:11 attendance 65:15 attended 39:12 42:13 64:25 132:3 attendees 3:2 attending 10:7 38:21 attention 81:11 83:13 attorney 3:6 4:5 4:12 5:6 10:9 122:23 129:4 137:19 attorneys 3:16 5:19 120:16 129:19 audio 9:13,14 august 19:18 23:18 24:4,13 26:18 62:8 95:2 99:5 102:15,22 authorities 47:5,7 authorization 77:11,21,24 83:8 authorized 67:16 automatic 119:10 119:19 124:4</p>	<p>131:18 availability 130:8 130:21 131:7,10 available 51:11 55:1 60:5 73:11 73:14 111:7 129:10,25 130:5 130:16 131:3,10 132:22 avenue 5:20 14:16 46:16,18 avi 3:14 10:18 aviluft 3:21 avoid 76:11 77:3 aware 20:6 53:20 53:24 54:7 57:23 91:4 100:24 105:20 107:4,9,19 125:15 126:1 131:14 132:4 azman 5:17 123:21,23 124:3,8</p>
b			
<p>b 5:15 7:13 33:11 41:8,18 61:21,22 62:1 99:10 102:18 103:9 b41716006 98:2 back 13:10 16:23 18:4 19:6 26:21 32:19 38:14 40:12 43:4 48:12 50:5 50:18,20 54:19 59:3,7 63:2,18,18 65:20 67:1 74:16 84:6,14 86:22,25 87:13 88:18 89:14 89:23 95:13,19 99:22 101:18 107:5,16 108:5 109:20 110:5,10</p>			

[back - capital's]

110:16 111:7,7 113:19 115:11 118:25 122:7 124:25 125:11 127:8,11 128:5 132:10,17 133:2 background 29:24 ballpark 19:7 bank 7:14 8:6 40:25 41:4,7,12 42:5 51:17,24 52:3,5,22,25 55:4 55:9,13,25 61:9,15 66:1 98:19 100:19 100:25,25 101:4 101:22 102:1,16 103:20,23 132:1 bankruptcy 1:1 2:1 9:20 38:22 39:13,21 42:13 53:21,25 54:8 57:13,19,24,25 63:10 119:6,12,20 120:13 121:4 122:23 123:1,4 124:2 126:2 128:16 129:4 131:19 based 28:16 29:15 30:9 40:9 63:4,7,9 67:12 70:19 119:16 122:22 129:3 basis 11:20 123:24 bear 12:17 68:4 began 35:17 beginning 2:20 10:9 13:11 18:5 32:20 38:15 67:2 73:1 89:24 119:1 122:9 128:6	behalf 2:18 10:12 10:16,19 132:24 believe 21:10 22:7 22:7,17 26:10 37:4 47:24,25 53:7 54:11 57:1 65:17 71:11 82:17 83:6,7 85:7 115:13,16,24 130:23 believed 53:6 69:4 69:5 76:15 83:6 benefit 103:21 best 27:18 28:16 30:23 33:19 40:19 117:12 118:1,8 132:25 better 38:6 107:12 beyond 12:23 bipc.com 3:10 bit 38:20 50:14 86:1 89:11 108:13 114:13 bitcoin 68:11,14 68:18 69:13 72:13 73:4 75:5 76:10 77:13 78:6,14,23 80:9 81:8,20,24 82:3,11,14 83:11 83:17,20,21,23 84:2,2,19 85:5 86:14 87:7,8,9,18 87:18 93:14,19,20 93:23 94:14,19 95:4,11 100:1,13 104:24 105:1,16 106:12,25 107:21 108:3 109:3,4,9 110:9,16,25 111:1 111:13 112:4,4,9 115:7 132:13	block 66:5 bonvoy 62:18 bottom 115:25 boulevard 14:3 branch 48:3 49:4 55:14 brandon 6:4 9:25 break 12:13 37:23 37:24,25 38:25 39:2,9 87:24 88:1 88:4,7 89:6 91:24 114:8,10 117:7 118:3,13,19 123:7 123:20 128:17 breakout 121:20 121:22 breaks 37:22 breath 114:13 brief 114:14 bring 81:10 83:13 broad 27:24 broadly 27:17 brought 29:15 brown 4:10 10:24 brownrudnick.c... 4:16 buchanan 3:4 10:15 buried 52:19 business 14:6 22:21 28:21 35:3 35:7,8 36:19 37:2 37:4,7,10,13,18 64:11,18 82:18	15:1 79:7,16 80:2 90:4,9,14 92:15 98:21 119:15 120:2 122:23 123:2 124:2 129:4 131:19 137:2 call 67:11 110:9 118:12 126:22 130:12 called 35:14 102:4 campaigns 64:9 canyon 14:7 capital 1:8 2:8 21:8,21,23 22:1,20 22:24 23:16 24:6 24:9,12 26:22,24 27:6,7 29:1,4 30:3 35:14,15,17,21,23 35:24 36:3,12 37:3,4,6,10,14,15 41:5,12,15 51:17 52:2,22,25 53:12 53:14,20,25 54:8 54:10 60:12,18 61:11 63:1,10 64:4,12,24,25 66:1 67:17 73:1,18 76:15,22 77:12,17 80:3,17,17,18,21 80:23 82:4,6,7,12 82:17,19 83:2,4 84:20,22,25 86:4 86:21 90:20 91:16 91:20 92:1,10,16 92:21 97:16,19,19 97:23,23 101:1,6 104:4 105:23 124:14,17,21 132:1 capital's 36:19,23 36:25
		c	
		c 7:16 33:11 67:23 67:24 68:1 c405 14:3 california 1:16 2:19 3:18 9:1 13:22 14:4,8,17	

[capitalization - conclude]

<p>capitalization 80:21 car 46:13,15,16,19 50:12,24 51:5 52:4,5 53:1 54:17 56:1,10,12 125:9 133:3 carlton 3:15 10:20 case 1:11 2:11 9:21 12:24 57:14 57:19 66:16,16 82:11 119:21 137:15 cases 57:25 107:2 cash 43:24 44:24 45:16 46:24 47:5 47:12,16,25 49:1,4 49:13 51:7,10,13 51:16,19 52:2,3,6 52:7,9,13,14,25 54:17 55:3,6,7 56:9,18,18 100:18 113:24 131:23 133:2 cashier's 49:20 caucus 121:6 cause 90:18 caused 82:14 cell 9:11 12:9 central 119:14 certain 11:19 128:9 certainly 29:24 30:4 certified 2:22 137:1,3 certify 137:4,17 chain 66:5 chambers 125:19 127:9,11</p>	<p>change 120:6 changed 26:25 charge 28:3 36:5,6 chase 8:5 95:21 96:2,6,22 97:15 98:9 101:19 103:1 103:17 104:6 cheaper 48:9 check 17:2 26:21 47:8,24 49:2,3,5,6 49:15,21 54:18 55:7 98:25 131:25 checks 48:8 51:14 52:10 chief 26:22,24 27:6,7 29:1,3 child 89:9,9 children 15:11 chosen 58:14 chris 72:25 73:5,6 75:3,19 76:11 christopher 72:23 chronologically 23:24 circleup 23:2,5 circular 36:9 circumstances 120:6 128:9 city 67:11 136:9 claimed 128:18 clarify 17:5 18:25 27:19 33:9 44:2 clear 54:15 72:13 75:16 76:24 123:22 129:12 clearly 75:23 121:1 client 119:22 120:9 121:8,17 122:20 132:9,25</p>	<p>close 96:15 129:14 closed 129:23 club 22:15,17 cofounder 21:20 coin 73:4 75:19 76:10 77:13 80:10 114:24 115:2 coinbase 7:20 8:12 73:21 74:2,9 75:4 81:1,21,25 82:8 83:17,24 84:19 86:14,23 91:25 93:1,15 94:9 97:18 98:10,14,16 99:2,23 105:11,13 105:17 107:1,14 110:3 111:15,16 111:20 112:2 117:5 coincidental 64:20 86:20 coins 75:14 colchis 22:20,24 colleague 10:19,20 10:21 colleagues 10:13 college 20:10,17 20:21,24 columbia 4:14 come 35:13 88:6 89:6 98:14 99:14 103:13,17 104:23 127:8 comes 98:8 coming 115:19 comment 99:15 commitment 88:2 89:10 committed 116:3 committee 5:12 10:12 31:12 39:17</p>	<p>40:5,9 50:16 129:13 132:24 communicate 71:23 communicated 123:8 communication 12:11 71:15,17,18 communications 70:11,20 123:18 123:19 companies 19:23 20:1,5 21:16 25:5 33:23 company 17:21 19:1,15 20:17 21:11,12 23:13,22 24:20 25:20 26:4 26:4,6 34:20,24,25 35:4,7,14,25 62:21 67:19 69:6,9 company's 35:3,8 35:10 compensation 47:2 53:8 54:22 competency 40:14 43:7 complaint 88:23 complete 29:9 101:15,16 115:12 completely 107:23 completion 137:15 comply 120:9 121:8 computer 59:25 68:5 concerning 39:18 70:12 72:3 104:3 108:24 conclude 133:8</p>
--	--	---	--

[concluding - cred]

concluding 133:10	75:9	77:16 78:9 79:1	38:22 39:13,22
concord 4:6	continuation	80:4 81:22 84:9	42:13 44:19 51:2
conducted 130:18	126:3	84:13 85:2 89:4	61:17,21 63:23
confer 120:1,17,23	continue 9:14 53:7	94:15 95:4,5,9	67:23 69:23 70:5
121:16 124:23	54:9 80:16 83:7	96:7 97:23 102:8	79:7,12,16,22 80:2
130:7 132:9,15	101:9 122:18,25	108:7 111:3 117:2	85:13,21 87:10
conference 120:6	123:14,24 126:12	123:10 124:6,7	88:19,20 90:4,10
120:15,20 129:3	127:16 129:5	133:13 134:8	90:15 92:15 93:2
130:9	130:24 131:1,2	136:6	95:8 105:21
conferred 125:13	continued 4:1 5:1	corrected 136:6	108:12 114:19
confirm 20:7	6:1 8:1 37:16	correction 44:18	126:5,13,20
21:17 23:25 31:20	80:18	44:21	127:16,18 128:14
44:18,20 45:1,8	continuing 120:15	corrections 136:3	128:25 129:7,8,11
49:23 71:22 95:15	contracts 17:16	counsel 5:12 9:18	129:17,22 130:1,2
97:24 103:24,25	contribution 82:4	10:6 13:13 32:12	130:4,10,13,18
confirmation 45:3	control 21:14	32:22 38:17 39:16	131:1 133:14,21
confirmed 104:8	43:13 70:18 81:17	40:19,24 42:6	133:25 134:2,5,7,9
confusion 25:13	81:18 90:22	43:5,9 46:6 49:17	134:15,18,24
26:6,9	controlled 43:21	52:16 54:20 60:7	135:3
connection 119:20	95:16	61:17 67:4 74:10	court's 106:18
considered 61:9	convenience	74:11 79:14 80:5	120:9 121:8
61:10 76:14	129:10	90:1 91:7 97:3	cousins 4:3,4
consult 11:22	conversation	102:16 116:23	10:20,21
52:18 79:13 80:5	58:23 70:22	117:22 119:3,4	covered 134:4
120:1	115:22,24	120:3,23 121:11	covid 37:21 105:3
consultant 22:17	conversations	122:11,17,19	crashing 96:14
33:13 73:1,6,6	72:10 122:22	123:4 124:24	create 121:20
75:18	conversions 112:4	125:14 127:1,2,23	cred 1:5,8,8,9 2:5
consultants 48:11	convert 111:10	128:11,15,19	2:8,8,9 9:19 19:20
64:2,6,14,25	converted 111:13	132:10,16,16,17	19:22 20:1 25:5
consulted 131:6	copies 40:24	133:8,14	25:12,20 26:4,11
consulting 129:19	copy 33:8 40:4	counter 47:24	26:12,13,16,22,24
contact 118:8	133:22	48:8 49:2,5 52:10	27:3,5,13,16 28:7
125:19	cordial 118:7	55:7	28:10,12,19,21,24
contacts 34:21	corner 98:1	couple 88:2	30:2,11,12,19 31:8
35:2,6,6	corporate 76:16	124:10	31:10,14,23,24
contained 93:14	76:18	course 38:5 116:3	32:7,25 34:2,5,15
136:5	correct 19:13	court 1:1 2:1 9:20	35:14,15,17,21,23
contend 54:9,9	20:22 21:21,22	10:2 11:14 17:23	35:24 36:2,11,19
context 27:13	23:4,12 36:24	18:9,10 29:11,15	36:23,25 37:2,4,6
60:13,14 64:5	61:23 71:9 76:13	30:8,13,16 32:12	37:10,13,15 41:5,9

[cred - deposition]

41:12,15,18 42:22 51:17 52:2,22,24 53:12,14,20,24 54:7,10 60:12,12 60:17,17 61:11 63:1,9 64:4,12,24 64:24 66:1 67:17 68:11 69:7,11 72:18 73:1,17 76:15,22 77:11,14 77:17 79:3,4,6,11 80:3,3,17,18,21 82:4,6,19,22,25 83:1,4 84:20,22,25 86:3,4 90:20,20 91:15,16,20,22,25 92:10,10,16,21 97:16,19,23 99:10 101:1,6 102:18 103:9 104:4 105:23 124:14,17 124:21 132:1 cred's 28:21 73:4 credit 24:14,19,21 25:11,15,20 26:3 26:12 33:16 34:19 34:23 97:10 98:13 98:19 creditors 5:13 10:13 crypto 20:5,6 73:7 73:16,17 92:10,21 cryptocurrency 17:4,8,16,20,22 18:24 19:4,12,15 19:23 20:2 22:2 22:13,25 23:6,14 24:9 28:3,7,20,22 29:16 31:9 40:6 40:10 70:13 72:17 73:5,10 75:3 80:3	80:4 92:1,6,6,11 105:22 csr 1:22 137:25 cumbersome 51:13 current 13:24,25 14:2 15:2,19 16:16 55:1 63:5 115:23 currently 46:10,13 53:1 131:14 cursor 81:10 custody 90:22 custom 42:14 43:2 43:12,19,20 customers 35:5 cut 73:19 cyber 24:14,17,17 24:19,22,24 25:6 25:10,17 26:5 33:10,14 34:1,11 34:18 d d 7:18 41:8,18 69:15 74:3 99:10 102:18 103:9 daily 33:23 dan 57:7,8 60:19 61:3 76:2,11 77:6 77:9 daniyal 68:20 69:1 69:2 dark 66:18 darren 5:17 data 84:17 103:24 104:17 date 16:15 17:10 17:12 42:6 44:3,3 44:4,5,14 45:9,10 53:22 59:3,5,17,19 61:7 78:7 83:4	85:4 86:8 87:2,23 96:10 109:25 137:20 dated 91:11 137:22 dates 21:7 23:25 44:2,22 45:2 74:20 79:2 109:23 109:23,24 dating 74:16 day 27:10,10,23 28:13 31:21,21 36:11 42:12 45:19 52:10 53:16 80:8 86:13,16,18 87:10 88:14,14 92:9 93:10 109:8 134:11 136:7 days 44:8 51:23 69:20 106:16 de 4:7 dealing 20:6 dealt 19:23 20:5 debated 117:22 debtor 10:19 43:4 49:16 51:6 107:7 110:6,10,17,22 113:23 debtors 1:6 2:6 42:18,19,22 51:18 51:20 52:24 53:2 92:11 98:6 106:8 113:24 114:17,20 115:8 116:4 129:13 133:1 december 65:19 65:23 66:8 decide 121:7 declaration 7:16 57:18,24 67:21	declare 136:1 decorum 118:10 dedicated 84:3,4,4 84:13 99:3,6 defendant 1:13 2:13 86:4 90:16 defendants 3:12 defending 91:7 defense 58:4 defer 56:6 60:4 115:15,15,16 definition 12:25 delaware 1:2 2:2 5:8 9:21 11:2 123:10 129:8,18 delete 72:2 delirium 107:25 delivering 116:3 deponent 1:16 2:19 7:3 18:15 38:4,7 44:20 46:12 48:19,21 54:5 55:11 64:1 71:9 87:2,14 95:9 112:21 113:11 114:21 118:3 122:17 depose 128:12 deposit 49:24,25 51:7 52:8,12 56:13,15 102:24 deposited 49:22 54:25 depositing 51:21 deposition 1:15 2:17 7:10 8:4 9:13 9:18,23 12:11,20 12:24 13:12 18:6 29:22 30:1,7,9 32:21 38:16 67:3 89:25 110:8 119:2
---	---	--	---

[deposition - ether]

119:11,18 120:10 120:16,19,25 121:15 122:9,13 122:18,21 123:1,5 123:6,9,15,25 124:5,15 126:3,5 126:13 127:12 128:7,17,20,22,25 129:6,14,15,15,21 130:24 131:2,15 133:9,11,11,15 135:9,12 137:14 described 116:12 description 31:7 31:16,19 32:3 33:18 34:10 36:14 48:2 93:16 98:18 99:15 descriptions 34:3 designation 26:8,8 despite 124:21 destination 97:17 detail 7:11 31:20 details 41:22 95:18 104:3 detected 76:25 detection 77:3 determination 41:19,20 116:22 determine 41:14 43:7 130:15 development 22:22 64:11 device 83:24 105:6 different 92:5 differently 134:22 difficult 11:13 28:11 30:14 121:3 digital 72:19,19 76:10 90:21 91:16 92:16,17 109:19	109:20 110:2 direct 23:9 directed 19:1 75:18 directing 119:22 119:24 120:9 121:7 122:20 123:24 direction 112:18 137:11 directions 127:1 directly 19:2 48:9 75:15,22 director 36:4 37:15 53:7,14 54:10 62:21 67:18 69:5 76:14 77:12 directors 35:10 disclose 46:6 discovery 70:9 104:16,21 115:13 116:1 discuss 29:21 discussing 31:6 discussions 36:9 dismiss 57:13,19 57:25 disposition 70:13 disrupt 121:4 district 1:2 2:2 4:14 9:20 119:15 dixie 14:7 document 59:7,18 59:20,21 61:13 70:9 78:12 85:22 88:19 96:12 101:19 108:23 114:15 documentation 100:20	documents 33:2,4 33:7 34:9 45:4 52:19 61:18 64:8 70:11,18 71:6 101:13 doing 43:8 63:16 76:3 107:20 109:15 118:8 121:5 dollar 77:13 dollars 16:7 29:16 31:9 82:10 105:18 107:3 dorsey 29:22 30:6 double 68:25 doubt 85:8 drive 51:5 52:5 due 52:13 128:9 duly 137:8 duties 27:2 dying 106:3 107:13 e e 7:20 14:16 33:11 40:15 64:9 71:15 74:4,5,9 81:4,4 93:5 115:11,21 119:6 125:5 earlier 96:6 easier 44:12 70:2,8 eastern 131:3 echo 74:4 81:5 93:5,6 effectively 34:1 effort 64:4 121:1 125:12 efforts 118:9 121:2 eighth 93:13 either 17:20 21:1 48:18 54:16 72:8	82:24 83:8 133:7 else's 60:9 emanuel 56:24 58:4,17 emergency 29:14 39:17,22 40:5,9 119:17 128:13 emery 5:14 10:12 50:16 employed 19:16 19:17 employee 83:1 137:18 employees 35:1,11 employment 17:17 31:5,18 32:3 33:15 35:17 36:13 endeavor 135:3 endeavoring 34:6 engage 120:15 ensure 132:25 entire 69:6 80:20 entities 25:14,24 26:10 entitled 54:22 entity 25:19,22,23 26:11 82:23,24 entry 57:2 equity 80:19 82:3 84:21 error 45:3 especially 133:1 esq 5:5 established 35:24 99:4 establishing 82:16 estate 133:1 estimate 19:9 et 1:5 2:5 9:19 ether 74:22,23
--	---	--	---

[evan - final]

<p>evan 134:23 evans 5:15 7:6 10:11,11 11:7 12:18,25 13:5,14 17:25 18:23 27:21 30:8,25 31:1 32:10,23 38:18 41:21 42:4,8,11 44:23 45:15 46:8 46:14 47:15,19,20 48:20,24 49:8,10 50:9,11,20,25 51:3 54:4,6 55:12 56:20,22 61:13,19 61:22 62:4,10,12 64:13 67:5,20,24 68:6,9 69:18 70:1 70:6,7 72:1 74:1,8 76:6 78:11,13 81:1,6 85:11,17,25 86:2,25 87:4,16 88:5,10,18,21 89:6 89:13,16 90:2,7,11 90:13 92:25 93:6 93:8 95:10,20 96:1,12,17,20 97:6 97:8 99:22,24 101:18,20,25 102:4,13,21,23 104:22 108:9,12 108:15,21,25 109:2 111:20 112:1,19,24 113:9 113:12,19,21 114:3,6,20,22 118:13 119:12,16 119:22 120:8,21 122:2,12,19 128:12 129:12 131:21 132:12,19 133:13,16,18,23</p>	<p>evasive 117:17 evening 125:24 129:9 132:20 event 62:7,17 63:6 63:17 65:15 66:13 events 62:19,23 63:5,7 64:7,10 66:14 eventually 25:5,11 26:23 27:6 33:15 105:18 107:15 everybody 50:22 evidentiary 130:19 exact 16:14 17:10 23:25 31:20 53:22 56:14 59:3,17,19 61:7 84:7 114:1 exactly 26:20 48:12 56:2 63:19 84:14 116:17 examination 7:3 11:6 examined 18:20 examiner 10:24 example 116:18 excel 8:10 exchange 82:9 excuse 135:10 execute 67:16 77:7 77:10,19,23 111:9 111:10 116:7 executed 40:6,10 55:18 93:10 94:10 94:19 106:11,16 108:3 109:17 116:8 136:7 executing 107:21 executive 34:23 executives 69:7</p>	<p>exhibit 7:11,13,16 7:18,20,22 8:5,8 8:10,12 42:1 61:19,22 62:1 67:22,23 68:1 69:15 71:8 74:3,3 74:4,5,9 81:3,4 85:11,14 86:25 90:5,8 93:3,3 95:23 96:21 102:9 102:10,14 108:11 108:16,18,22 111:22,23 112:2 exhibits 7:9 8:3,17 existence 25:10 125:15 expect 75:14 expedite 134:12 expedited 133:17 133:19 expense 82:13 expenses 82:18 84:25 86:22 experienced 73:7 expertise 54:11 explain 41:11,13 explained 110:3 extend 129:14 extent 122:15 127:5</p> <hr/> <p>f</p> <hr/> <p>f 7:22 14:16 85:11 85:14 90:6,8 facilities 34:20 fact 29:15 92:9,16 96:5 117:23 121:1 124:21 129:21 facts 132:11,17 fair 93:16 family 15:5</p>	<p>far 98:15 116:16 fargo 7:11,13 8:8 40:25 41:4,8,23 48:9 98:19 99:8 99:12 101:22 102:1,4 103:3,7,14 103:18 104:6,12 fast 108:13 fear 106:2 february 1:17 2:21 9:1,6 23:10 39:12 40:21 41:22 42:7,12 43:18,24 47:21 49:13,14 110:7 113:22 114:4,4 128:14 132:3 137:22 federal 137:14 fedwire 98:19 feel 38:6 130:20 134:21 feeling 38:1,2 39:5 39:5 114:12 feels 127:6 fees 100:4 fifth 93:12 file 79:11 filed 9:19 40:5,8 53:20,25 54:8 57:13 67:21 85:12 88:23 119:5,14 128:16 132:4,5 filing 54:1 87:14 119:7,9,12,17 120:14,25 121:4 123:1 124:1 126:3 131:20 filings 40:12 119:21 final 134:24 135:1</p>
---	---	--	--

[finally - golubchik]

finally 131:12 finance 66:4 financial 20:16 21:24 22:2,10,11 24:7,8 27:9,11,12 27:14,17,25 28:1,2 28:14 29:5,6,8 30:19 32:1 35:25 44:9 53:18 financially 10:4 137:17 find 38:23 59:7 134:25 finding 34:25 35:4 121:1 fine 39:6,8 118:14 127:24 135:7 finley 14:15 46:16 46:18 fire 79:4 82:22 83:8 fireblocks 68:15 72:18 73:18 77:14 77:16 fired 79:3 83:3 firm 9:25 10:3,21 firms 57:3 first 17:3,8,19 18:24 19:3,14,16 20:20 40:1 59:1 61:2,20 80:25 81:7 93:7,20 94:20 102:21 112:12,14,15,19 121:21 five 114:10 118:16 118:17,20 fixes 13:4 flow 39:7 flower 3:17	focus 30:5 follow 54:24 124:10 following 90:15 91:16 92:14 100:11 follows 18:21 foregoing 136:2 137:5,7,11,13 form 47:14 53:6 64:11 69:22 76:5 108:8 111:8 formalized 35:20 former 26:4 80:12 80:15 formulate 34:23 forth 40:12 115:11 137:6 forward 119:11 130:24 forwarding 119:6 119:13 four 14:19 87:18 100:12 fourth 93:12 94:20 113:10 frame 35:19 125:18,22 frankly 52:19 friday 124:19 front 20:18 31:16 85:7 93:4 130:4 134:15 full 11:17 13:15 20:19 35:17 46:17 83:1 fully 87:10 functional 35:19 functions 31:21 fund 80:17 97:19	funded 69:9 funding 34:24 funds 43:8 46:10 47:9 52:22 72:17 97:16 124:14,18 124:21,22 fungible 56:18 further 92:18 119:25 120:1,5,5 120:15 123:16 137:13,17 future 66:13	giving 126:25 go 9:15 11:11 13:3 17:24 20:9,10 32:10 34:11 36:8 38:8 45:14 48:20 62:14 63:3 64:9 64:15 65:5,18 66:20,22 86:22,25 87:13 95:12 99:22 101:18 102:21 108:25 110:20 113:19 118:15 119:11 121:21,25 126:17,20 127:7 127:21 131:4 god 18:14 going 9:5 11:10,12 11:14,16 13:7 18:1 23:23 29:20 30:16 32:16 34:3 36:8 38:8,10,19 40:12 43:3 45:11 52:1,4 54:18 55:3 61:21 62:25 64:15 66:23 84:14 89:19 89:21 95:13 104:5 108:16 112:18 113:14,15 117:7 117:14 118:15,23 121:2,6,21,25 122:4 125:19 126:4,7,11,12,19 127:9,15,17,21 128:2 130:24 132:4 134:9,15 135:10 goldman 21:4,6 golf 96:19 golubchik 122:24 122:24 123:12,14 123:18 125:21
		g	
		g 8:5 95:23 96:19 96:21 gather 64:21 generated 99:16 99:16 geneva 62:18 66:16 geoffrey 3:5 10:15 13:1 30:8 geoffrey.grivner 3:10 getting 94:13 98:4 127:1 gilman 4:11 10:23 10:23 giovanni 72:23 give 16:3 17:13,13 18:13 19:7 28:16 38:4 40:19 56:14 113:8 114:9 118:15,17 121:11 123:4 125:18,20 125:22 given 104:15 118:1 123:13 134:14 137:12 gives 30:15	

[golubchik - indicates]

126:8,21 127:5 good 9:4 11:8,9 gotten 40:15 grab 69:8 graduate 20:11,13 great 122:3 134:14 grivner 3:5 10:15 10:15 12:18 29:20 30:22 32:13 45:11 46:8,9 47:14 50:13,19 60:5 69:22,24,24 71:5 76:5 87:13,24 89:8,15,17 104:19 108:8 117:25 118:19 119:4,13 119:19,24 120:13 121:13,18,22 122:14,22 123:6 123:11,22 124:1,7 124:12,23 125:10 125:20,25 126:6 126:10,14,25 127:3,10,14,19,25 128:24 129:2,2,20 129:24 130:2,7,23 131:5,13,17,21 132:9,15,21,23 133:4 134:6,7,8 135:7 grogan 133:25 134:1,3 ground 11:11 group 64:14 67:12 guess 50:17 60:4 75:12 guys 37:20 114:8 117:7	h h 8:8 15:10 68:23 68:25 102:7,9,10 102:14 hair 88:9 half 15:16 125:5 hand 18:11 36:16 39:6 47:8 98:1 131:9 handle 120:24 happen 52:11 happened 65:9 79:22 108:4 happy 31:19 118:16 120:1,14 hard 108:14 hardware 75:17 78:18,20 83:24 106:4 107:5,16 110:5 111:8 hastings 3:13 10:18 head 22:21 health 37:21 hear 50:22 129:1,8 129:9 heard 129:7 hearing 38:21 39:13,16,22 40:16 42:13 79:16,22 80:9 86:19 88:14 88:15 130:13,18 132:3,6 hedging 31:11 held 25:2 43:2,18 54:17 72:20 76:11 77:14,17 81:20 91:25 104:3 help 18:14 52:21 helpful 39:7	hereto 42:3 62:3 68:3 69:17 74:7 85:16 95:25 102:12 108:20 111:25 136:5 high 64:19,21 highlight 109:1 hired 19:20 24:14 26:13,18 history 74:2,10 81:2 93:2 hold 16:16 17:23 17:24 38:9 41:12 63:5 92:5 holding 97:16 home 13:25 14:5,6 14:7 honest 11:17 126:22 honestly 126:25 hope 34:6 36:10 38:5 125:23,23 hotel 62:17,18 65:22 hotels 65:12 hour 125:5,22 hours 125:6 house 15:21,24 16:9 45:25 hover 83:13 112:17 113:6,6,9 how's 134:11 huh 41:16 44:7 53:19 54:23 65:16 65:24 69:21 72:15 77:18 81:12 87:17 94:23 97:12 100:3 101:17 106:6,10 109:11 111:19 126:6,10	hundred 111:5,6 hundreds 40:15 i idea 39:25 identification 42:2 62:2 68:2 69:16 74:6 85:15 95:24 102:11 108:19 111:24 identified 124:15 illegal 76:16,18,22 immediately 36:15 51:18 53:3 impacts 131:20 important 134:16 improper 128:21 inaccessible 106:4 inamullah 68:20 69:1,2,12 71:12,21 72:3,9 73:3 75:3 76:1,9 incapacitated 105:6 106:2,9,22 107:11,23 108:2 109:14 included 28:21 includes 103:8 incoming 12:15 incorporated 24:20 indemnification 58:14 59:5,21 indemnify 57:10 independent 69:8 independently 35:24 69:9 index 7:1 8:1 indicated 39:17 87:25 indicates 88:16 126:2
--	--	--	---

[individual - know]

individual 72:20 individuals 64:19 76:20 industry 19:15 35:6 information 8:20 104:20 120:11 ingersoll 3:4 10:16 inhumane 118:4 initial 80:19,21 84:12 99:1 initialed 136:4 initially 82:4 injunction 7:23 85:12,19 88:19 ink 136:4 instruct 12:22 45:11 46:9 instructed 129:5 instructing 30:23 120:4 instruction 8:23 51:12 126:14 instructions 54:25 127:1 intend 42:17 intended 35:25 51:22 intention 51:7,9 52:8,12 62:21 63:2 64:22 interest 35:8 interested 10:5 137:18 interests 35:3 interfere 9:12 interim 132:24 internally 121:6 international 66:4 internship 21:6	interrogatory 7:18 69:19 71:1 investigated 75:10 investment 31:11 80:19 84:22 investments 23:10 involved 17:3,22 22:10,20 31:10 66:6 involvement 20:2 22:16 28:6,8,19 issue 68:5 106:8 116:2 issued 12:21 29:15 85:20 93:11 128:13 issues 30:6 120:18 128:18 131:9 istanbul 65:23 66:10 67:7,9,10,15 item 109:1,3 110:20	january 7:13 21:19,19 23:3,17 24:3 29:17,17 36:19,21 37:3 53:13,15,24 54:7 56:21,23 57:17 58:10,23 59:10,14 61:16 62:11,13 63:3,12 66:8 67:22 104:24 105:2,17,20 106:11 107:20,21 107:21 109:3,8 112:5,5,6,6 115:6 115:7 132:13,13 jbevans 5:23 jeff 60:4 job 1:23 20:20,24 22:5,15 24:24 25:2 26:14,16 27:5,13,22 28:10 28:12 30:18 31:3 31:6,14,15,18 32:3 32:6,24 34:10,14 34:17 36:14 53:17 118:8 joe 38:23 45:14 50:16,23 66:18 68:4 71:10 76:3 76:12 77:19,21,22 81:4 90:6 93:5 100:14 102:8 108:17 118:3 jog 65:22 joined 67:6 joining 10:22 jointly 9:21 joseph 5:5,15 10:11 11:1 joseph.mcmahon 5:10	jpmorgan 8:5 95:21 96:2,6,22 97:15 98:9 101:19 103:1,17 104:6 jtd 1:11 2:11 9:21 judge 12:21,24 29:22 30:6 judge's 119:17 judgment 54:12 july 8:5 23:2 33:15 64:3 78:5,8,23 79:12,17,23 81:8 81:14,25 82:21 83:10,23 85:20 86:8 88:23 89:1,2 91:11,12,13,16 92:14,14 93:10 95:3,12,12,21 96:12,22,23 97:9 98:8 100:12 101:21 103:2,12 103:12,16 104:11 jump 38:19 june 35:18,20 37:17,18 68:10 70:14 72:3 75:2 79:3 82:22 83:2
	j 8:12 111:22,23 112:2 james 1:12,15 2:12 2:17 7:4,16 9:18 13:12,16,20 18:6 18:19 27:15,22 28:3,9,15 29:9 31:8,22 32:5,21 34:13 38:16 41:8 41:8,17,18 45:11 46:9 54:4 56:16 67:3,21 74:12 84:1 89:25 98:20 99:10,10 102:17 102:18 103:4,8,8,9 119:2 122:10 128:7,12 136:1,15		k kept 46:3,4,5,5 key 35:5 kicked 50:17,17 kind 17:9 46:19 kinds 92:6 knew 75:25 106:17 know 12:1,9 16:1 20:4 23:24 25:9 25:24 26:20,25 31:12 33:1,3,22 36:16 40:11,22 47:7 50:4 54:13

[know - mail]

56:2,3,3,5 61:10 64:9 72:11,25 75:12 78:21 79:8 79:9,10,13 80:5 84:6 89:10,16 91:18 94:3,6,7 98:16 99:17,18 100:15,17 101:2,3 101:12 103:19 106:2 107:25 113:25 115:20,23 116:5,16 117:2,2 118:18 121:2 125:15 126:20,21 126:25 127:11 129:18 130:8,10 130:14,15,21 134:21 knowledge 23:1,7 23:15 118:1 knowledgeable 35:12 known 75:13,21	lawyer's 51:5 lawyers 59:2,10 59:11 60:9,11,18 61:3 115:22 116:7 layman 54:11 leave 106:4 led 33:15 ledger 78:15,17,18 78:24 81:20,25 83:20,24 86:14 92:4,5 107:14 108:5,10,22,24 113:20 left 16:20,24 24:12 legal 10:1,3 13:15 25:6,9 40:1,11 43:7 52:16,19 54:11 57:5,6,7,8 58:4 59:13 79:9 79:24 116:20,22 116:22 117:23 123:23 legitimately 54:22 76:14 lending 22:15,17 23:9 letter 96:18 102:6 108:11 111:21 leveraging 34:20 liabilities 53:4,8 liability 47:1,13 libra 24:14,19,21 25:11,14,19 26:3 26:12 33:16 light 119:9,11 120:13 123:1,13 limit 29:25 limited 12:20,23 30:1 33:10,14 line 17:18 83:15 103:18 108:25	109:3 110:20 113:10 114:5,7 linkedin 21:13,20 23:24 liquidate 82:8,10 82:14 liquidated 80:22 82:5,16 84:1,19,24 84:24 85:4 87:3 89:2 95:7,11 100:13 105:18 107:3 111:6 liquidating 93:14 liquidation 80:16 82:2 85:1 86:21 87:18 88:13 94:4 95:4 110:4 liquidations 112:3 list 112:15 listed 87:20 lists 34:2 literally 40:15 litigation 124:5 little 11:13 38:20 44:11,12 50:14 51:12 85:25 89:11 108:13 live 13:21 14:12 15:2,3,4,4,4 108:10,23 113:20 137:3 lived 14:10 llc 1:9 2:9 4:3 25:21 26:4,11,12 26:13 local 26:8 location 46:6 locations 64:18,19 log 85:6 114:1 logical 37:23	long 14:10,18 17:21 20:9 longer 75:24 89:11 124:4 look 16:23 17:11 19:5 24:2 59:3,7 63:18 65:20 74:21 74:21 86:16 99:25 looked 98:10 117:5 looking 16:4 17:12 21:13 80:6 91:25 99:23 130:12 looks 93:18 los 1:16 2:19 3:18 9:1 14:16 lost 50:14,23 52:15 66:18 lot 40:12,17 75:10 75:24 110:7 luft 3:14 10:18,18 13:3 32:14 63:22 63:24 66:20 121:15 123:3,8 124:9,13 125:1,25 126:7,11,19 127:13 129:24 130:3,22 131:12 133:10,17,18 134:1,3,13,20 135:1
l			m
l 14:16 15:10 68:23,23,25 l.l.c. 23:10 l.p. 22:21,24 language 90:23 large 94:14 lastly 35:9 law 3:6,16 4:3,5 4:12 5:6,19 10:21 57:3 120:18 129:18 lawsuit 79:11 lawyer 11:18 12:12 40:1 51:6 58:14,16 60:6,16 79:9,14			m 1:21 2:21 33:12 68:23,25 137:24 machine 137:9 mack 10:21 madam 18:9 madison 5:20 mail 64:9 71:15 115:21 119:6 125:5

[mailing - neither]

mailing 13:25 14:2 mails 40:15 115:11 maintain 37:15 41:7,17 118:7,10 maintained 41:4 management 22:21,24 36:1 42:14 43:3,12,19 43:20 manner 76:25 march 35:18 36:20,21 37:3 marked 8:17 42:1 62:1 68:1 69:15 71:8 74:5 85:14 95:23 102:10 108:18 111:23 market 5:7 63:1 73:7 marketing 62:22 63:17 64:4,6,17 marketplace 22:5 22:9,12 markets 21:8 marking 61:17 marks 13:7,11 18:5 32:16,20 38:10,15 66:23 67:2 89:20,24 118:22 119:1 122:4,8 128:2,6 married 15:7 marriott 62:17 63:13 mateo 79:12 85:13 85:20 88:20 math 113:14 matter 9:19 10:25 51:14	matters 35:11 mcdermott 5:14 10:11 50:16 mcmahon 5:5 11:1 11:1 mean 17:6 27:12 28:1,8 30:13 40:2 42:19 54:2 73:13 73:16 75:9 78:19 84:23 93:18 98:7 98:7,15,24 99:7,8 103:5 107:9 110:1 112:14 125:8 means 39:25 40:17 79:8,10 88:3 meant 45:9 52:10 80:22 media 9:17 13:7 13:12 18:6 32:16 32:21 38:10,15 66:23 67:3 89:20 89:25 118:22 119:2 122:4,9 128:2,7 135:11 medication 38:24 meet 67:9 melissa 1:21 2:21 10:2 137:24 members 35:1 memory 65:22 mentioned 25:14 25:22 26:10 mentioning 25:25 mercedes 46:20,21 mersin 67:11 message 126:16 127:4 messages 12:15 microphones 9:7 9:12	mid 120:25 middle 13:17,18 63:3 miller 6:4 9:25 million 16:7 millions 29:16 31:9 mind 114:8 minute 114:10 120:22 minutes 38:4,6,25 39:4,9 88:2,4,7 89:7 117:8 118:16 118:17,20 121:10 125:16 127:8,20 misheard 63:24 missing 115:17 116:24 117:18 118:17 132:12 mistaken 66:12 misunderstanding 19:25 mixed 74:19 moment 59:7 66:19 80:18 money 42:20 45:22 49:21 52:13 54:25 55:5 116:21 116:24 118:17 moneys 52:7 month 17:1 months 15:16 16:25 62:20 66:14 morgan 99:17 morning 129:25 131:3 mortgage 15:24 16:2 motion 39:18,22 40:4,8,20,22 57:13 57:25 132:4,5	move 55:23 80:3 81:10 105:1,4,10 moved 29:17 104:23 105:11,25 106:1 moving 105:9,22 multiple 118:2 mwe.com 5:23
			n
			n 14:16 33:12 68:23,25 name 9:25 13:15 13:17,18 15:9 74:11 91:20,22 96:23 97:15 98:22 101:22 102:17 103:2 104:7 137:21 natural 88:7 nature 28:21 40:2 71:18 130:19 necessary 127:6 need 17:14 18:7 21:2 32:2 33:3,6 34:7,8 36:13 37:21,25 38:3 41:18 52:16 53:2 56:13 63:4 84:11 84:13,14 89:8,14 98:25 100:21 117:7 118:18 120:22 121:22 126:19 127:11 133:7,21 134:21 134:24 135:1 needed 76:16 82:13,13 87:25 130:10 needs 51:17 130:4 neither 123:17 137:17

[net - p.m.]

<p>net 64:19,21 network 34:21 35:2,6 73:18 networking 62:22 63:17 64:17 never 77:2 106:7,7 new 5:21,21 north 5:7 notations 48:6 note 9:7 12:18 29:20 88:1 104:19 121:15 131:12,17 137:3 noted 136:4 noticing 10:9 november 53:21 number 43:15 56:14 70:24 81:3 93:4 97:25 102:6 112:22 116:18 135:11 numbers 84:7,16 112:8,9 nw 4:13</p>	<p>occurring 79:16 october 23:11 offered 59:18 office 5:4 11:1 51:5 officer 26:22,24 27:6,7 29:1,4 officers 35:11 official 5:12 10:12 offline 78:21 oftentimes 21:16 oh 65:24 86:18 104:16 okay 11:25 12:8 12:14 13:6,19 14:9 15:6 19:10 19:19 20:8 21:18 21:25 22:4,8,19 23:8,16 24:11,16 25:18 28:18 30:21 31:22 36:5,17 37:6,9 38:7 39:11 40:23 41:3,10 43:10,23 44:10,15 45:13,24 46:12,23 47:3,18 48:1 49:7 49:11,19 50:2,8,25 51:25 53:23 54:14 55:17 56:8 57:22 58:2,6,11,15,20 59:8,23 60:8,8,21 61:1,1,12 62:9 63:20 65:2,7 66:21,22 67:9,13 68:13 72:6,16 73:25 75:1 76:23 77:5,18 78:5,10,19 78:22 79:5,21 80:7,14,24 81:13 81:23 82:20 83:5 85:3,24 86:6,7,12</p>	<p>87:22 88:11,17,25 89:5,13,19 91:2,6 91:10,14 92:13,24 94:8,12 95:6,17 96:9,17,17 97:1,5 97:13,21 98:12,17 99:11,19 100:5,6 100:16 104:10 105:8,12,15,19 106:15,20 107:18 108:1,9 109:7,12 109:18 110:11,15 110:19,24 111:4 112:11,21 113:3 113:13,17 114:23 115:5 117:4,6 122:1 124:9 125:1 126:19 127:19,23 132:23 133:14 134:2,5,9 135:3,5 135:5 once 75:17 95:7 one's 127:2 ones 26:1 94:5 ongoing 66:4 82:6 82:18 115:11,21 116:2 121:16 onward 99:5 open 75:4,24 102:24 108:10 116:11,16 117:21 129:15,22 133:12 operate 82:17 operating 84:25 operations 37:5,7 37:11 82:6 108:10 108:23 113:20 opinion 116:22 opposed 55:5 opposition 128:24</p>	<p>orchestrated 76:21 order 7:22 12:20 29:12,15 36:14 79:15 85:12,19 88:19 90:4,9,15 91:4,8,11 92:15,21 93:11 104:2 105:21 106:18 109:24 119:18 120:10 121:8 124:18 128:13 131:16,20 133:15 133:18 ordered 12:24 29:22 30:6,9 75:17 80:2 90:17 126:5,13 127:15 128:25 131:14 orders 127:16 129:22 organize 62:22 organized 63:17 63:19 original 33:8 82:3 94:3 97:18 137:14 originally 83:21 outcome 10:5 overall 34:23 owed 16:1 53:4,7 owned 43:21</p>
<p>o</p>			<p>p</p>
<p>o'clock 122:8 oaks 14:4,8 98:20 oath 18:20 obfuscate 121:1 object 11:19 47:14 69:22 76:5 objection 11:20 108:8 129:21 objections 13:2 obligation 89:12 obtain 34:19 occur 120:20 occurred 54:1 87:10 104:9 119:8 123:2</p>			<p>p.m. 2:20,20 9:2,5 13:8,11 18:5 32:17,20 38:11,14 66:24 67:2 86:9 89:21,24 118:23 119:1 122:5,8 128:3,6 135:9,11 135:13</p>

[pacific - presumption]

<p>pacific 9:5 13:8,11 18:2,5 32:17,20 38:11,15 67:2 89:21,24 119:1 122:5,8 128:3,6 page 7:10 8:4 42:9 74:15 88:9 90:12 93:7,13 97:7,9 101:19 pages 1:25 paid 47:16 60:11 60:16,18 61:2 66:1,8 palo 15:1 papers 40:4 paragraph 90:14 90:24,25 92:19 parked 46:16 part 47:2 80:15 82:2 86:20 96:16 104:16,16,21 115:13,13,19 participant 73:7 participants 9:24 participate 127:5 parties 9:15 30:15 120:17 partner 23:17,20 partners 35:5 parts 17:7 party 10:4 137:19 passport 16:16,18 patience 66:19 patrick 4:11 10:23 pattern 80:18 paul 3:13 10:18 paulhastings.com 3:20,21 pause 12:15 59:6 pay 49:1 59:2,13 60:9 82:13 84:25</p>	<p>86:21 paying 47:4,6 57:8 59:10 payment 48:13,22 48:23 57:11 61:4 61:5,6 62:11,13 65:12,14 payments 48:11 48:18 57:3 penalty 136:2 pendency 128:17 132:5 pending 11:22 12:12 50:13 123:9 124:5,17 126:7 pennies 53:9,10 pennsylvania 3:8 people 64:9,21 110:8 116:18 period 33:12,12 periodic 37:22 periodically 71:23 perjury 136:2 permit 90:18 permits 119:18 person 73:8 personal 30:10 41:15 49:25 50:3 50:5,6 51:8,10,21 52:6 55:4,19 63:11 103:7,13,18 104:12,14 115:18 119:5 121:4 126:2 128:16 personally 17:19 persons 42:22 pertains 137:13 petition 124:2 pfeiffer 120:2 123:17</p>	<p>pgilman 4:16 philadelphia 3:8 phone 12:9 71:15 72:9 phones 9:11 physical 49:4 pick 9:8 pieces 107:8 pike 4:6 place 9:11,15,23 14:7 69:10 77:4 119:10,20 137:6 placed 109:20 placeholder 128:10 places 64:20 plaintiffs 1:10 2:10,18 86:3 plan 38:25 62:20 63:1 planned 62:5,24 66:14 planning 47:4,6,6 62:25 plans 63:4,5 platforms 75:10 please 9:7,9,11 13:6 14:6 17:24 18:8,10 28:5 32:15 37:1 38:9 38:13 41:21 42:8 44:14,19,20 49:9 50:9 67:20 74:1 76:8 81:1 87:1 88:18 90:2 93:1,7 101:18,25 113:7 118:21 121:16,19 125:18 130:14,14 130:20 132:24 podulka 76:3,12 76:21 77:1,19,21</p>	<p>77:22 83:8 point 30:5 37:23 119:24 poor 37:20 position 53:11 73:9 119:9,16 120:8,14 121:12 124:3 125:11 126:1,16,24 127:4 131:18 132:11 positions 120:3 possession 70:17 78:25 90:21 possibility 131:11 possible 38:1 51:22 82:10 101:16 114:12 124:25 125:4,7,11 125:13 130:15 131:10 134:14 135:1 posted 44:2,21 45:1,8 posting 44:5 postings 44:8 potential 35:1 precedent 126:1,9 precise 32:8 precluding 105:22 precursor 26:4 predecessor 25:20 preliminary 7:23 85:19 88:19 90:3 prepayment 62:16 66:12,15 67:14 present 10:6 11:18 president 36:4 presume 113:18 presumption 37:14</p>
---	--	---	--

[pretty - reason]

<p>pretty 108:13 120:25</p> <p>prevents 126:3</p> <p>previous 58:22</p> <p>previously 8:17 12:21 21:12 58:21 60:12 63:2 90:10</p> <p>price 112:20</p> <p>prior 14:12,20,21 14:21,25 19:11,22 20:1 35:18 59:10 59:14 61:15 86:16 123:18 137:8</p> <p>privilege 11:20</p> <p>privileged 57:1,4</p> <p>probably 12:9</p> <p>problem 13:4 38:5 89:13</p> <p>proceed 13:13 18:17 32:22 38:17 67:4 90:1 112:9 119:3 121:7 122:11,12,20 128:11,20,22,23 130:3</p> <p>proceeding 9:22 18:8 128:25</p> <p>proceedings 137:5 137:7,9,15</p> <p>proceeds 84:15,20 84:20,21 98:9 100:7,18 101:1 110:4 111:7 112:12,25 115:6</p> <p>process 40:1 52:16</p> <p>produced 41:23 42:6 96:5</p> <p>producing 52:20</p> <p>professional 137:3</p> <p>project 66:3</p>	<p>promote 35:3,7 64:10</p> <p>property 47:17 124:16,17 133:1</p> <p>prosper 22:5,9,12</p> <p>protected 76:16</p> <p>provide 27:24 31:18 32:8 33:20 34:3 35:7,9 36:7 43:3 51:6 52:14 59:4 75:25 80:23 82:5 97:19,22 100:20,25 101:4,8 101:9,10,15 104:2 120:10 126:8 132:21</p> <p>provided 22:12 24:8 28:14 32:1,9 40:24 45:5 74:10 74:11 97:3 98:5 101:5,7,13,14 102:1,16 104:20 108:23 115:8 120:11 123:11 126:17</p> <p>providing 27:14 29:5,7,8</p> <p>provision 28:2</p> <p>prudent 105:4 125:9</p> <p>pte 24:15 26:7 33:10,12,14 34:11</p> <p>pull 33:2 47:11 59:18 60:1 61:13 61:15 67:20 81:1 85:11 90:2 93:1 95:20 101:25 104:13 111:20</p> <p>pulled 55:24</p> <p>pulling 55:5</p>	<p>purchase 16:12 17:8,15 18:24 19:4 46:21</p> <p>purchased 16:9 17:20</p> <p>purchasing 19:11</p> <p>purported 79:4 82:22 83:3</p> <p>purpose 85:1</p> <p>purposes 130:9</p> <p>pursuant 104:20 128:13</p> <p>pursue 35:25</p> <p>pursued 37:13 64:12</p> <p>pursuing 37:18</p> <p>put 51:10 52:3,3,5 69:10 74:1 77:3 99:13 107:15 133:7</p> <p>q</p> <p>quant 24:15,17,18 24:19,22,25 25:15 25:15,16 34:11</p> <p>quanta 25:15</p> <p>quantum 25:7,17 26:5 33:10,11,14 34:1,18</p> <p>quantum's 25:10</p> <p>quarter 37:5,8,9 37:12</p> <p>queries 35:10</p> <p>question 11:22 17:5,18 18:25 20:5,7 28:5,9,11 28:17 30:23 31:4 31:13 32:2 33:25 35:22 37:1 40:7 42:25 44:11,12 45:12 46:10 50:13 51:4 54:5 56:6</p>	<p>58:24 60:4,15 76:8 77:8 85:9 92:18,20 98:3,4,7 101:11 103:11 104:17 110:1 116:5,11,15,20,20 117:1,10,11,12,14 117:15,17,18,20 117:21,23,24 118:14 122:15 124:25</p> <p>questions 11:10,16 11:19,21 12:22 25:8 29:25 30:4 30:15 33:5 34:7 68:7 88:5 114:9 117:8 119:23,25 121:3 124:10 129:16</p> <p>quickly 125:13</p> <p>quinn 56:24 58:4 58:17</p> <p>quite 27:17</p> <p>r</p> <p>r 33:11</p> <p>raise 13:2 18:10 39:6</p> <p>rbc 21:8,11</p> <p>reach 69:11 106:8 125:21</p> <p>read 48:2 55:13 70:10,16 90:15 92:18 98:18 112:22 136:2</p> <p>ready 128:21</p> <p>realized 108:4</p> <p>really 52:16 104:1 118:4,4 134:16,20</p> <p>reason 25:6,9 38:24 77:24 85:8 85:8</p>
---	--	--	--

[reasonable - responses]

reasonable 35:9	32:10,16,19 33:1	refusing 124:20	111:12 112:8
reasons 110:3	38:9,11,14 51:1	regarding 29:22	rephrase 58:25
recall 16:14,22	66:20,22,24 67:1	119:7 120:3,6,15	report 7:20 74:12
17:2,10 19:5,11	70:22 71:11,17,19	120:17 129:9	132:10,17
21:2,7,10 22:16	71:24 72:10 88:16	130:8 131:6	reported 1:20
23:19,21 24:5,23	89:20,21,23	132:11	reporter 2:22 10:2
25:1,7,25 26:15,16	104:19 111:17	region 11:4	11:14 17:23 18:9
26:19,25 38:21	118:23,25 121:11	registered 137:2	18:10 32:12 44:19
39:20,21 41:1	121:21,25 122:5,7	regularly 71:23	51:2 61:17,21
45:21 48:17 56:18	127:8,12,22 128:2	relate 22:2 30:7	63:23 67:23 69:23
56:19 57:15 58:9	128:5 131:13,18	related 10:3 66:4	70:5 93:2 95:8
59:5,17,19 61:7	131:22 133:7	105:23	108:12 114:19
69:14,14 71:14	135:10,10 137:8	relates 131:19	133:7,14,21,25
73:9,23 75:6,7,11	137:12	relation 30:11	134:2,5,7,9,18,24
79:15,24 80:12	recorded 9:17	relationship 33:9	135:3 137:2,3,3
81:14 85:4,22	recording 9:14	relative 137:18	represent 10:24
92:2 94:3 95:14	records 16:23 17:2	relay 126:16 127:4	113:15 123:16
100:15,21 110:7	17:11 19:6 21:3	relevant 120:16	representing 11:3
receive 68:11	31:17 55:9,13	relief 40:5,9	request 70:9,10,25
73:10 75:13,22	61:9 65:20 70:12	relies 64:18	71:3,4 120:21
received 71:13	84:11 87:5 98:25	rely 43:5 52:16	130:25 131:6,8
75:5,14,17,18 78:5	99:23 117:5	remain 129:21	requested 8:20
78:14,15 80:19	recovering 37:21	remaining 52:23	100:20 104:21
83:17,21 99:1	recovery 118:5	remains 116:11,15	118:20 137:16
receiving 73:11,14	refer 64:5 84:11	117:21 121:16	required 11:21
recess 13:9 18:3	85:6 88:18 114:3	133:12	62:16 66:15
32:18 38:12 66:25	reference 32:3	remember 20:20	100:24 120:11
89:22 118:24	36:13 39:24 76:21	20:25,25 31:24	129:17
120:23 122:6	113:8,25 114:24	39:14,19,24 57:20	reside 14:18,22
128:4	referenced 83:4	69:19 107:20	46:11
recognize 91:18	91:19	109:15 110:13	residence 15:2
91:20,22 93:17	references 101:12	116:14 117:19	resolved 116:16
94:1,5	referencing 23:23	remind 93:2	respect 67:14
recollection 32:5	83:18 100:22	remote 1:15 2:17	118:11
34:13,14 70:19,23	referred 87:15	remotely 3:2 9:24	respond 124:24
71:12 98:25 99:20	referring 59:20	10:7	125:11,12
103:20,22 104:9	63:8 70:3 71:5	rent 15:20	responded 70:16
110:6 117:13	76:19 113:7	reopen 127:15	response 35:10
record 9:5,16 10:8	reflects 114:15	repeat 28:5 35:22	71:10 75:25
13:3,8,10 17:24	refuses 30:20	37:1 40:7 54:5	responses 7:18
18:2,4 29:21		58:24 76:8 103:15	69:20

[responsibilities - series]

responsibilities 24:24 27:3,10,15 28:23,24 29:3 31:14 32:7,25 33:24 34:14,17 35:19 responsibility 36:2 responsive 70:18 rest 100:7,9,17,18 restraining 7:22 79:15 85:12,19 90:3,9 91:8 93:11 retain 71:19 72:10 return 42:20 49:16 51:19 54:18 121:11 returned 51:17 53:2 returning 42:17 42:19 132:7 reversed 107:15 review 31:19 33:18 137:15 reviewed 100:1 reviewing 103:22 revisited 63:4 right 16:13 18:11 19:21 22:6,15,22 22:23 23:3,11,18 25:3 26:17 29:12 34:3 37:17 40:21 41:6 43:13,21 44:25 47:9,11 51:10 53:21,25 54:3,8,19 55:19 58:4 60:8,23,24,25 65:3,9,13 67:23 70:23 72:14,15,21 72:22 74:13 75:5 76:4,12 77:1,15,23	78:1,6,15,25 79:3 79:3,7 81:21 82:22 83:22 84:20 85:1 86:15 87:19 88:15 89:3 91:8 91:12 92:7,11 94:10 96:2,16 97:3,16 98:1,22 101:1 104:12 105:23 106:14,18 110:17,22 111:2 114:11,24 115:1,3 117:5 119:13 120:4 126:15,22 127:18 risk 69:4 robert 10:25 role 29:2 31:20 33:18,22 34:1,2,4 62:20 67:18 room 12:2,5 121:22 rooms 10:6 121:20 rooney 3:4 10:16 rough 133:20 134:13 rpr 1:21 2:22 137:25 rudnick 4:10 rudwick 10:24 rule 131:1 rules 11:11 résumé 20:18,19 21:3 s sachs 21:4,7 safe 46:3,4,5 69:10 77:4 safeguards 132:25 salary 48:22,23 49:1 53:8	sale 87:9 113:5 sales 64:4,6 sam 50:9,15 56:20 61:14,15 66:17 74:3 78:11 81:1,3 85:11 86:1,25 88:8,18 90:5 92:25 96:18 97:6 99:22 101:18,25 102:6,21 108:11 109:1 111:20,21 112:19 113:9,19 114:3 samuel 5:18 10:14 san 79:12 85:13,20 88:20 saturday 69:20 saying 20:21 31:25 32:1 39:3 86:19 88:13 107:19 108:6 115:18 says 21:20 30:13 30:19 48:2 74:11 88:22 98:1,18 schatt 69:7 76:3 76:11,21,25 77:6,9 77:11 83:8 scheduled 62:7,7 80:16 86:21 109:16 scope 12:20,23,23 13:1 30:1 34:17 scott 3:15 4:4 10:20,20 scottcarlton 3:20 screen 81:7 112:23 screenshot 71:12 scroll 42:9 47:19 48:19 49:8 50:9 50:10 56:20 62:10 74:15 88:8 90:11	93:7 97:6 search 60:1 second 12:17 20:24 32:11 34:22 37:8 67:10 74:15 90:11 93:23 96:15 112:15 121:3 secret 31:12 section 87:7,7 secure 78:21 see 38:6 40:4,8 42:15 44:1 47:23 48:5,12 50:18 74:16,17,18,19,24 81:9,12 83:12 86:3,5,8,10 88:22 90:23 91:1 93:12 93:21,24 94:22 96:24 97:9,11 100:2 101:23 102:19,25 109:5 109:10,22 110:21 112:7 114:7,15,18 114:21 120:23 127:20 134:9 seeing 87:5 seeking 40:9 seen 127:2 send 55:3 60:3,6,6 69:12 73:3 75:19 sense 16:8 34:12 107:25 sensitive 9:8 sent 54:21 68:14 68:15 70:10 71:12 76:1 83:23 84:2,3 86:13,18,18 111:7 125:5 september 74:22 series 11:16 92:5 94:17 99:21
---	--	--	---

[series - submitted]

102:15 server 50:17 services 20:16 21:24 22:2,10,11 24:7,8 27:9,11,12 27:14,17,25 28:1,2 28:14 29:5,6,8 30:19 32:2 35:25 36:1 44:9 53:18 57:5,6,7,9 59:14 set 137:6 settle 47:1 seventh 93:12 94:25 share 41:22 shared 71:7 sherman 14:3,8 98:20 short 37:24 114:13 shorthand 2:22 137:1,10 show 103:24 showed 99:9 shows 49:3 side 71:19 121:23 sift 40:17,18 signature 137:23 silence 9:11 silvio 72:23 similar 52:9 similarly 130:23 simple 42:25 75:7 75:12 92:20 simultaneous 102:3 simultaneously 27:20 44:13 55:10 singapore 24:20 25:19 26:6,8 single 31:24	sit 120:10 124:4 sitting 50:12 77:13 118:1 125:8 131:24 133:2 situation 63:11 six 16:25 87:19 sixth 93:12 94:24 ski 64:15 slightly 89:8 slow 108:13 slowly 9:9 11:15 smaller 94:5 sold 112:9 sole 36:4 37:14 53:6,14 54:10 62:20 67:18 69:5 76:14 77:12 solemnly 18:12 solutions 10:1,3 someplace 64:23 soon 38:1 51:22 114:12 124:25 125:4,6,11 130:15 132:22 134:14 sorry 12:4 16:17 17:2 28:5 36:21 37:20 40:7 50:14 50:20 56:13 60:15 68:24 79:19 84:8 89:12 93:3 94:1 103:5,15 112:5 sort 39:7 109:25 130:13 sought 69:10 south 3:7,17 spadafora 72:24 72:25 73:5 75:4 75:19 76:11 spadafora's 76:2 speak 9:9 11:12,14 52:17 129:13	speaker 54:2 speaking 12:12 27:20 44:13 55:10 specific 13:23 19:24 27:4 33:18 43:14 60:10 79:25 80:6 117:16 specifically 27:19 69:8 70:3 79:24 81:16 100:21 123:25 124:16 speech 102:3 spell 33:10 68:21 spelled 14:15 spend 56:16,17 spent 56:4 spoke 58:7 spoken 59:9 spouse's 15:9 spreadsheet 8:10 stack 73:20 stacked 23:25 stage 43:6 stand 13:6 18:1 32:15 38:13 52:15 66:22 89:20 116:6 118:21 121:19,25 128:1 standard 9:5 stanley 99:17 stark 10:25 start 26:2 30:14 34:10 68:6 70:5 started 38:23 starting 33:14 37:12 state 10:7 79:7,12 79:16 85:20 88:20 90:4,10,14 92:15 118:5 120:17 136:9 137:2	statement 7:14 8:6 8:8,12 61:15 95:21 96:22 104:13,14 statements 96:6 96:13 97:2 99:8 100:19,25 101:4 102:1,5,16 103:21 103:23 104:3 states 1:1 2:1 9:20 11:2,3 16:21,24 90:15 status 15:20,21 115:23 stay 119:10,19 124:4 126:7 131:19 stayed 65:22 stenographically 1:20 steps 43:6 stock 112:20 stop 42:10 56:21 76:3 stopped 107:13 stopping 76:12 store 48:4 55:15 78:21 straight 52:1 81:19 88:12 strategic 35:5 strategy 31:11 34:24 street 3:7,17 4:13 5:7 15:1 structure 34:19 subject 115:10,21 120:5 submitted 57:18 57:23
---	---	--	--

[submitting - tough]

submitting 69:19	t	terminated 82:25	tim 125:3 132:23
subscribed 137:21	t 33:12	terms 40:13 52:15	time 9:6 16:20
subsequently 99:4	take 9:15 13:1	79:24	19:14,16 30:3,5,13
107:7	17:7 37:22,23	testified 18:21	35:9,13,17,19 38:3
substantial 33:4	39:2,9 44:8 45:6	testify 130:11	44:19 58:7 59:1
substantively 34:4	49:17 51:9 52:2	testifying 1:16	60:16 61:2 65:6
sued 79:6 89:1	53:9,10 62:19	2:19 137:8	73:22 74:20 79:6
suffering 37:20	78:11 92:25 107:8	testimony 18:12	83:1,6 89:8,14
sufficient 36:8	114:8,10 118:13	31:22 48:25 108:2	95:1 104:23 105:3
suite 3:7 4:13 14:3	118:16,19	136:5 137:12	125:18,21,22
superior 85:13	taken 2:18 9:18	text 12:10	131:3 137:6
supersedes 119:17	69:6 137:5	thank 18:16 30:25	times 9:10 118:2
suppliers 35:5	takeover 76:17,18	54:4 121:24 124:8	timestamps 86:17
support 57:18,24	76:22	130:22 133:5,23	timing 53:5
64:3 118:9 126:17	talk 24:17 33:20	134:4 135:8	timothy 5:16
supporting 64:6,8	37:17 48:15 58:12	thing 31:24 47:10	10:14
supposed 107:6,17	80:25 91:24	47:11 89:9 94:13	title 24:22 26:14
sure 12:16,25 16:6	121:10	131:21	26:16,19,23 36:7
17:13 19:17,25	talked 58:13,13	things 105:5	today 11:11,18
21:13 32:14 33:19	90:10 102:17	think 23:22 25:13	12:3,6 20:21
34:16 43:16 53:22	talking 17:15,19	41:18 48:21,22	29:21 30:7 31:22
58:25 75:9,10	55:8 87:17 108:13	50:20 54:2 68:17	51:8 54:19 115:12
79:2 80:1 84:10	109:14	68:23 71:6 73:24	116:5 118:2
86:24 103:10	tax 47:1,4,7,13	74:2 81:17 84:12	119:23 135:6
108:15 112:17	53:8	87:14 89:7 98:4	today's 30:1 133:8
130:25	taxes 47:16,17	107:13 119:19	135:9
surrounding 63:9	team 34:23 35:1	120:21 125:9	told 103:19,22
suspend 126:4	124:24	126:19 128:20	tomorrow 120:12
suspended 127:13	tech 73:20	134:13,16	129:25 130:13,18
127:14	technical 40:13	third 25:18,22,23	131:3 134:10,17
swear 18:7,12	tell 56:11 99:20	26:11 34:25 37:9	134:18,21,25
swept 98:4	107:24 119:14	37:12 74:22 83:15	135:2
107:4	tells 46:6	thirteenth 4:13	tonight 60:3 132:8
switzerland 62:6	temporary 7:22	thought 105:4	top 42:7 74:12
62:14,25 63:3	79:15 85:12,18	106:3	96:23 98:1
66:9,12 67:15	90:3,9 91:8 93:11	thread 71:17	topic 88:6
sworn 10:10 137:8	ten 38:4,6 81:8,24	three 23:20 25:14	total 16:8 94:18
systematic 80:22	82:14 84:2 87:8	66:7 94:7 95:1	113:15 135:11
82:2,15 94:4	89:7 117:8 135:11	114:9	touch 127:9,10
systematically	tenure 27:1 80:20	till 95:2	tough 126:24
82:5			

[trade - vera]

<p>trade 66:4</p> <p>trading 28:4,7 31:10 73:16</p> <p>transact 111:9</p> <p>transaction 7:20 44:3,4,5,6,14,22 45:2,9,10 56:24 57:4 61:10,11 63:12 74:2,10,12 74:22,23 76:12,24 77:7,10,20,23 80:12,13,15,25 81:7,8,15 83:11,15 85:6 93:1,13,20,23 94:4,14,15,20,24 94:25 97:18 99:2 100:1,8,8,9 101:21 102:22 103:1,13 103:16 104:5,11 106:12,17 107:15 109:4,9 112:13,14 112:16 113:1,4,7 114:4,5</p> <p>transactions 39:18 40:6,10 48:8 67:17 72:4 74:16 75:11,23 87:20 93:9,17 94:2,10,18 98:10 99:21,25 100:12,22 103:20 104:9 107:4,10,22 108:3 109:13,16 111:1,10,18 113:16 115:7 116:8,9 132:14</p> <p>transcribed 137:10</p> <p>transcript 133:15 136:3 137:11,14 137:16</p>	<p>transfer 48:9 51:12 55:18 68:18 69:1,3 75:3 76:9 81:24 84:12 90:17 90:19 91:15 92:16 92:21 107:13 111:7 113:24 114:16</p> <p>transferred 30:2 31:9 42:14 43:17 49:12 52:24 54:16 70:14 72:18 80:9 84:15 92:9 95:14 95:15 107:6 108:4 109:22 110:2,4,5,9 110:16 111:1 113:23 131:24</p> <p>transferring 43:8 107:20</p> <p>transfers 29:23 30:2,9,12</p> <p>transmit 90:18,19 91:15</p> <p>transmitted 78:24</p> <p>travel 65:12</p> <p>traveled 67:10</p> <p>trick 28:11</p> <p>trip 62:5 64:15,18 64:25 66:2,8,9,9 66:11,11 67:6,15 67:15,16</p> <p>trips 66:7</p> <p>true 80:8 113:18 136:6 137:11</p> <p>trunk 52:4 53:1 55:25 56:10,11 125:9 131:24</p> <p>trusted 73:6</p> <p>trustee 5:4 11:2,3</p> <p>trustees 5:3</p>	<p>truth 18:13,14,14</p> <p>try 11:12,14 31:2 127:17 134:16,18</p> <p>trying 12:15 17:17 40:17,18 66:5 134:25</p> <p>tuesday 1:17 2:21 9:1</p> <p>turkey 65:18</p> <p>turn 124:20</p> <p>turned 124:18</p> <p>two 15:14 26:10 31:8,23 32:6 39:18 104:16,21 108:3 109:13 115:14,19 125:6</p> <p>type 64:10</p> <p>u</p> <p>u 33:12,12 68:23 68:25</p> <p>u.s. 5:3,4 77:13 82:10</p> <p>ucd 114:24 115:2</p> <p>uh 41:16 44:7 53:19 54:23 65:16 65:24 69:21 72:15 77:18 81:12 87:17 94:23 97:12 100:3 101:17 106:6,10 109:11 111:19 126:6,10</p> <p>ultimately 84:1</p> <p>uncertainty 63:9</p> <p>undersigned 137:1</p> <p>understand 11:23 17:17 26:7 29:11 29:12,19 30:16 34:6 40:20 84:18 97:14 108:14 115:17 125:10 126:24 127:3</p>	<p>128:19 131:5,7,8</p> <p>understanding 119:7</p> <p>understood 89:15 89:17 121:13,18 133:4</p> <p>unfortunately 48:6</p> <p>unidentified 54:2</p> <p>unintelligible 52:7 55:11 87:13</p> <p>united 1:1 2:1 9:20 11:2,3 16:21,24</p> <p>university 20:14</p> <p>unpack 73:12</p> <p>unsecured 5:12 10:13</p> <p>unwell 38:2 39:5</p> <p>urgency 131:8</p> <p>usd 73:4 76:10 80:10 115:2</p> <p>usdc 72:13 111:8 111:11,13 114:16 114:24</p> <p>usdoj.com 5:10</p> <p>use 73:24 90:18,20 91:15</p> <p>v</p> <p>v 1:11 2:11</p> <p>vail 63:13,14,16 64:25 65:3,8 66:9 66:16 67:15</p> <p>value 16:8</p> <p>variety 48:17 62:22 64:1</p> <p>various 79:9 132:10,17</p> <p>vehicle 131:24</p> <p>ventura 14:2</p> <p>vera 11:3</p>
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[verified - zoom]

verified 88:23 veritext 10:1,3 versus 64:23 video 9:14,17 128:10 videographer 6:3 9:4 10:1 13:6,10 18:1,4,16 32:15,19 38:8,13 66:21 67:1 89:19,23 118:21,25 121:19 121:24 122:3,7 127:21 128:1,5,10 133:6 135:5,8 videotaped 1:15 2:17 view 131:15 134:20,23 villagran 1:21 2:22 10:2 137:24 violation 106:17 131:16 virtual 9:23 12:1 voices 9:9 volume 1:18 2:18 7:5 136:16	wallets 78:15 108:24 walsh 5:16 10:14 38:3,5 125:3,17 127:7,17,20,24 132:23,23 133:5 133:21,23 want 11:11 13:23 14:13,23 26:2 29:25 33:6,22 34:13,13 39:2 52:14 53:9 59:6 68:21 76:2 85:25 106:3 109:1 112:22 118:13,16 120:24 128:22 wanted 14:5 106:23 wants 126:8 washington 4:14 way 20:9 30:15 31:4 33:19 36:18 48:9 52:9 63:18 78:21 80:22 82:15 85:10 109:25 ways 19:3 website 21:15 wednesday 38:22 40:16 54:12 week 48:14 56:9 58:3 96:7 weeks 116:13 wells 7:11,13 8:8 40:25 41:4,7,22 48:9 98:19 99:8 99:12 101:21,25 102:4 103:3,7,14 103:18 104:6,12 went 65:3,8 66:18 105:17 106:25 107:1 116:14	western 20:14 whatsapp 69:13 70:20 71:13,16,17 71:23 72:9 whatsapps 72:2 whatsoever 20:3 wheeler 57:17,23 58:8 59:1,13 60:19,23,24 wheeler's 57:7,8 61:3 wheelers 59:9 whereof 137:20 whispering 9:8 wife 65:6,8,12 willing 128:21 wilmington 4:7 5:8 11:2 wilson 10:21 wire 58:3,18,21 wired 55:4 withdraw 43:25 45:16,19 46:24 withdrawal 47:21 48:3,7 49:3 55:14 withdrawn 49:13 49:14 131:23 witness 10:10,16 12:22 18:7 130:12 137:20 witnesses 137:7 word 33:11,12 work 20:1,15,17 21:4,8 24:3 34:22 51:13 53:12 75:9 134:12 worked 19:14,16 19:17,22 20:16 21:12 23:2,9,16,21 24:2 31:8,23 32:6 35:13 60:12,17	64:2 working 12:19 68:7 80:17,23 82:6,17 86:21 97:19,23 works 104:1 worth 64:19,21 115:2 wrap 88:3 write 59:22 written 49:15 71:10,25 wrote 131:25
w			
w 5:16 wait 70:5,5,5 134:24 wallet 72:19,19 73:11,14,15 75:13 75:17,21 76:10 78:17,18,18,20,24 80:10,11 81:20,25 82:9 83:21 92:4 106:4 107:5,14,16 108:5,11 109:19 109:21 110:2,5 111:8			y
			y 14:16 15:10 33:11 yeah 17:25 19:17 24:20 25:4 48:6 48:14,21,22 51:15 61:19 62:7,19 63:15 65:25 71:9 72:22 74:25 83:23 84:11 87:6 91:13 93:22 96:8 97:17 100:14 104:1,16 112:8,8,10 115:10 134:3 year 14:11 15:16 16:10,12,14 17:13 17:14 19:7 37:13 62:8 64:3 years 14:19 20:22 20:23 23:20 31:8 31:23 32:6 yep 36:22 york 5:21,21
			z
			zoom 9:24 11:13 39:13 85:25 110:8

Exhibit E

Redacted in its entirety

Exhibit F

Redacted: Pages 630 - 800

Fill in this information to identify your case:

Debtor 1 **James Alexander**
 First Name Middle Name Last Name

Debtor 2
 (Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

Case number **1:21-bk-10214-MB**
 (if known)

☐ Check if this is an amended filing

Official Form 106Sum

Summary of Your Assets and Liabilities and Certain Statistical Information

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Fill out all of your schedules first; then complete the information on this form. If you are filing amended schedules after you file your original forms, you must fill out a new *Summary* and check the box at the top of this page.

Part 1: Summarize Your Assets

		Your assets Value of what you own
1. Schedule A/B: Property (Official Form 106A/B)		
1a. Copy line 55, Total real estate, from Schedule A/B.....	\$	1,260,000.00
1b. Copy line 62, Total personal property, from Schedule A/B.....	\$	757,433.56
1c. Copy line 63, Total of all property on Schedule A/B.....	\$	2,017,433.56

Part 2: Summarize Your Liabilities

		Your liabilities Amount you owe
2. Schedule D: Creditors Who Have Claims Secured by Property (Official Form 106D)		
2a. Copy the total you listed in Column A, <i>Amount of claim</i> , at the bottom of the last page of Part 1 of <i>Schedule D</i> ...	\$	1,058,576.00
3. Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 106E/F)		
3a. Copy the total claims from Part 1 (priority unsecured claims) from line 6e of <i>Schedule E/F</i>	\$	0.00
3b. Copy the total claims from Part 2 (nonpriority unsecured claims) from line 6j of <i>Schedule E/F</i>	\$	255,564.44
Your total liabilities		\$ 1,314,140.44

Part 3: Summarize Your Income and Expenses

4. Schedule I: Your Income (Official Form 106I)		
Copy your combined monthly income from line 12 of <i>Schedule I</i>	\$	0.00
5. Schedule J: Your Expenses (Official Form 106J)		
Copy your monthly expenses from line 22c of <i>Schedule J</i>	\$	15,000.16

Part 4: Answer These Questions for Administrative and Statistical Records

6. **Are you filing for bankruptcy under Chapters 7, 11, or 13?**
- ☐ No. You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.
- ☒ Yes
7. **What kind of debt do you have?**
- ☐ **Your debts are primarily consumer debts.** *Consumer debts* are those "incurred by an individual primarily for a personal, family, or household purpose." 11 U.S.C. § 101(8). Fill out lines 8-9g for statistical purposes. 28 U.S.C. § 159.
- ☒ **Your debts are not primarily consumer debts.** You have nothing to report on this part of the form. *Check this box* and submit this form to the court with your other schedules.

Debtor 1 **James Alexander**Case number (if known) **1:21-bk-10214-MB**

8. **From the *Statement of Your Current Monthly Income*:** Copy your total current monthly income from Official Form 122A-1 Line 11; **OR**, Form 122B Line 11; **OR**, Form 122C-1 Line 14.

\$ _____

9. **Copy the following special categories of claims from Part 4, line 6 of *Schedule E/F*:**

	Total claim
From Part 4 on <i>Schedule E/F</i>, copy the following:	
9a. Domestic support obligations (Copy line 6a.)	\$ <u>0.00</u>
9b. Taxes and certain other debts you owe the government. (Copy line 6b.)	\$ <u>0.00</u>
9c. Claims for death or personal injury while you were intoxicated. (Copy line 6c.)	\$ <u>0.00</u>
9d. Student loans. (Copy line 6f.)	\$ <u>0.00</u>
9e. Obligations arising out of a separation agreement or divorce that you did not report as priority claims. (Copy line 6g.)	\$ <u>0.00</u>
9f. Debts to pension or profit-sharing plans, and other similar debts. (Copy line 6h.)	+\$ <u>0.00</u>
9g. Total. Add lines 9a through 9f.	\$ <u>0.00</u>

Fill in this information to identify your case and this filing:

Debtor 1	James Alexander		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO		
Case number			

☐ Check if this is an amended filing

Official Form 106A/B Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☐ No. Go to Part 2.
- ☒ Yes. Where is the property?

1.1

3551 Dixie Canyon Pl.

Street address, if available, or other description

Sherman Oaks **CA** **91423-0000**
City State ZIP Code

Los Angeles
County

What is the property? Check all that apply

- ☒ Single-family home
- ☐ Duplex or multi-unit building
- ☐ Condominium or cooperative
- ☐ Manufactured or mobile home
- ☐ Land
- ☐ Investment property
- ☐ Timeshare
- ☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another

Other information you wish to add about this item, such as local property identification number:

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?	Current value of the portion you own?
\$1,260,000.00	\$1,260,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Fee simple

☐ Check if this is community property (see instructions)

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$1,260,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Debtor 1 **James Alexander**

Case number (if known)

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles☐ No☒ Yes

3.1 Make: **Mercedes**
 Model: **E350**
 Year: **2012**
 Approximate mileage: **69,000**
 Other information:

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another

☐ Check if this is community property
 (see instructions)

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?

Current value of the portion you own?

\$13,000.00

\$13,000.00

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

☒ No☐ Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

\$13,000.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
 Do not deduct secured claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

☐ No☒ Yes. Describe.....

Debtor 1

James Alexander

Main Document Page 5 of 46

Case number (if known)

Misc household goods and furnishings: Hot water heater \$100
 Washer/Dryer \$743
 Ikea Baby Cribs \$100
 Couch \$100
 Mirror Consol \$100
 Office desk \$100
 Padded chairs x4 \$100
 Wood chairs x2 \$100
 Childrens toys \$100
 Linens \$100
 Kitchen table \$100
 Kitchen chairs x4 \$100
 Kitchen buffet \$100
 Misc. Kitchenware \$100
 Photo frames family photos x16 \$100
 Flatware \$100
 Kitchen counter-top appliances \$100
 Dishwasher \$100
 Refrigerator \$100
 Stove/Oven \$100
 Installed Shelving \$100
 Pantry foodstuff \$100
 Beds 2x \$100
 Large sitting chairs x2 \$100
 Side tables x4 \$100
 Gun safes x3 \$100
 Standing lamps x2 \$100
 Glass and metal mirror set \$100
 Misc. House. Goods \$100

\$3,543.00**7. Electronics**

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

☐ No☒ Yes. Describe.....**Misc electronics at home:****\$2,096.00****8. Collectibles of value**

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

☐ No☒ Yes. Describe.....**Misc pictures and artwork****\$1,100.00****9. Equipment for sports and hobbies**

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

☐ No☒ Yes. Describe.....**Household games and sports equipment****\$800.00****10. Firearms**

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

☐ No☒ Yes. Describe.....

Debtor 1

James Alexander

Main Document Page 6 of 46

Case number (if known)

AR15 M4, Smith & Wesson 38 and ammunition

\$2,119.00

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No☒ Yes. Describe.....

Misc clothes at home: Used clothing

\$100.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☒ No☐ Yes. Describe.....

13. Non-farm animals

Examples: Dogs, cats, birds, horses

☒ No☐ Yes. Describe.....

14. Any other personal and household items you did not already list, including any health aids you did not list

☒ No☐ Yes. Give specific information.....

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$9,758.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☒ No☐ Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No☒ Yes.....

Institution name:

17.1.	Other financial account	Funds on deposit with JP Morgan Chase (x6006)	\$93,197.34
17.2.		Wells Fargo account ending x9285	\$246.84
17.3.		Wells Fargo Account ending x1923	\$480.71
17.4.	Checking Account	DIP Wells Fargo Account ending x0816	\$121,484.00
17.5.	Joint checking account	Wells Fargo joint x2155	\$6,140.04

Debtor 1 **James Alexander**

Case number (if known)

17.6. **Savings****Other Wells Fargo****\$700.00****18. Bonds, mutual funds, or publicly traded stocks***Examples:* Bond funds, investment accounts with brokerage firms, money market accounts☒ No☐ Yes..... Institution or issuer name:**19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture**☐ No☒ Yes. Give specific information about them.....

Name of entity:

% of ownership:

CircleUp

%

\$3,347.36**20. Government and corporate bonds and other negotiable and non-negotiable instruments***Negotiable instruments* include personal checks, cashiers' checks, promissory notes, and money orders.*Non-negotiable instruments* are those you cannot transfer to someone by signing or delivering them.☒ No☐ Yes. Give specific information about them

Issuer name:

21. Retirement or pension accounts*Examples:* Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans☐ No☒ Yes. List each account separately.

Type of account:

Institution name:

IRA**Etrade****\$22,212.34****IRA****Personal Capital; X6555****\$59,186.54****IRA****Personal Capital; X7330****\$78,591.12****401(k)****Sequoia One (Mass. Mutual)****\$50,640.27****22. Security deposits and prepayments**

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others☒ No☐ Yes. Institution name or individual:**23. Annuities** (A contract for a periodic payment of money to you, either for life or for a number of years)☒ No☐ Yes..... Issuer name and description.**24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.**

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

☒ No☐ Yes..... Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):**25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**☒ No☐ Yes. Give specific information about them...

Debtor 1 **James Alexander**

Case number (if known)

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property*Examples:* Internet domain names, websites, proceeds from royalties and licensing agreements☒ No☐ Yes. Give specific information about them...**27. Licenses, franchises, and other general intangibles***Examples:* Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses☒ No☐ Yes. Give specific information about them...**Money or property owed to you?****Current value of the portion you own?**
Do not deduct secured claims or exemptions.**28. Tax refunds owed to you**☒ No☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....**29. Family support***Examples:* Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement☒ No☐ Yes. Give specific information.....**30. Other amounts someone owes you***Examples:* Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else☒ No☐ Yes. Give specific information..**31. Interests in insurance policies***Examples:* Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance☐ No☒ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund value:

Northwestern Mutual term life insurance**Unknown****Unknown****32. Any interest in property that is due you from someone who has died**

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☒ No☐ Yes. Give specific information..**33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment***Examples:* Accidents, employment disputes, insurance claims, or rights to sue☐ No☒ Yes. Describe each claim.....**Cred Capital, Inc. D&O or E&O Insurance****\$250,000.00****34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims**☒ No☐ Yes. Describe each claim.....**35. Any financial assets you did not already list**☐ No☒ Yes. Give specific information..

Debtor 1

James Alexander

Case number (if known)

LBA tokens 4,374,799 and BTC token 1**\$47,449.00**

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$733,675.56**Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.**

37. Do you own or have any legal or equitable interest in any business-related property?

☐ No. Go to Part 6.

☒ Yes. Go to line 38.

Current value of the portion you own?
Do not deduct secured claims or exemptions.

38. Accounts receivable or commissions you already earned

☒ No

☐ Yes. Describe.....

39. Office equipment, furnishings, and supplies

Examples: Business-related computers, software, modems, printers, copiers, fax machines, rugs, telephones, desks, chairs, electronic devices

☒ No

☐ Yes. Describe.....

40. Machinery, fixtures, equipment, supplies you use in business, and tools of your trade

☐ No

☒ Yes. Describe.....

misc computer and electronics**\$1,000.00**

41. Inventory

☒ No

☐ Yes. Describe.....

42. Interests in partnerships or joint ventures

☒ No

☐ Yes. Give specific information about them.....

Name of entity:

% of ownership:

43. Customer lists, mailing lists, or other compilations

☒ No.

☐ Do your lists include personally identifiable information (as defined in 11 U.S.C. § 101(41A))?

☒ No

☐ Yes. Describe.....

44. Any business-related property you did not already list

☒ No

☐ Yes. Give specific information.....

Debtor 1 **James Alexander**

Case number (if known)

45. Add the dollar value of all of your entries from Part 5, including any entries for pages you have attached for Part 5. Write that number here.....

\$1,000.00

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

- ☒ No. Go to Part 7.
☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

- ☒ No
☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		\$1,260,000.00
56. Part 2: Total vehicles, line 5	\$13,000.00	
57. Part 3: Total personal and household items, line 15	\$9,758.00	
58. Part 4: Total financial assets, line 36	\$733,675.56	
59. Part 5: Total business-related property, line 45	\$1,000.00	
60. Part 6: Total farm- and fishing-related property, line 52	\$0.00	
61. Part 7: Total other property not listed, line 54	\$0.00	
62. Total personal property. Add lines 56 through 61...	\$757,433.56	Copy personal property total \$757,433.56
63. Total of all property on Schedule A/B. Add line 55 + line 62		\$2,017,433.56

Fill in this information to identify your case:

Debtor 1 **James Alexander**
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

Case number
(if known)

☐ Check if this is an amended filing

Official Form 106C

Schedule C: The Property You Claim as Exempt

4/19

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

- ☒ You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)
- ☐ You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own <small>Copy the value from <i>Schedule A/B</i></small>	Amount of the exemption you claim <small>Check only one box for each exemption.</small>	Specific laws that allow exemption
3551 Dixie Canyon Pl. Sherman Oaks, CA 91423 Los Angeles County Line from <i>Schedule A/B</i> : 1.1	\$1,260,000.00	<input checked="" type="checkbox"/> \$600,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.730
2012 Mercedes E350 69,000 miles Line from <i>Schedule A/B</i> : 3.1	\$13,000.00	<input checked="" type="checkbox"/> \$3,325.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.010
Misc household goods and furnishings: Hot water heater \$100 Washer/Dryer \$743 Ikea Baby Cribs \$100 Couch \$100 Mirror Consol \$100 Office desk \$100 Padded chairs x4 \$100 Wood chairs x2 \$100 Childrens toys \$100 Linens \$100 Kitchen Line from <i>Schedule A/B</i> : 6.1	\$3,543.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020

Debtor 1 **James Alexander**

Case number (if known)

Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own <small>Copy the value from Schedule A/B</small>	Amount of the exemption you claim <small>Check only one box for each exemption.</small>	Specific laws that allow exemption
Misc electronics at home: Line from <i>Schedule A/B</i> : 7.1	\$2,096.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
Misc pictures and artwork Line from <i>Schedule A/B</i> : 8.1	\$1,100.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.040
Household games and sports equipment Line from <i>Schedule A/B</i> : 9.1	\$800.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
AR15 M4, Smith & Wesson 38 and ammunition Line from <i>Schedule A/B</i> : 10.1	\$2,119.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
Misc clothes at home: Used clothing Line from <i>Schedule A/B</i> : 11.1	\$100.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
IRA: Etrade Line from <i>Schedule A/B</i> : 21.1	\$22,212.34	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.115(a)(1) & (2), (b)
IRA: Personal Capital; X6555 Line from <i>Schedule A/B</i> : 21.2	\$59,186.54	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.115(a)(1) & (2), (b)
IRA: Personal Capital; X7330 Line from <i>Schedule A/B</i> : 21.3	\$78,591.12	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.115(a)(1) & (2), (b)
401(k): Sequoia One (Mass. Mutual) Line from <i>Schedule A/B</i> : 21.4	\$50,640.27	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.115(a)(1) & (2), (b)
Northwestern Mutual term life insurance Beneficiary: Unknown Line from <i>Schedule A/B</i> : 31.1	Unknown	<input checked="" type="checkbox"/> 0% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.100(a)
misc computer and electronics Line from <i>Schedule A/B</i> : 40.1	\$1,000.00	<input checked="" type="checkbox"/> 100% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.060
misc computer and electronics Line from <i>Schedule A/B</i> : 40.1	\$1,000.00	<input checked="" type="checkbox"/> 0% <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020

Debtor 1 **James Alexander** Case number (if known) _____

3. **Are you claiming a homestead exemption of more than \$170,350?**
(Subject to adjustment on 4/01/22 and every 3 years after that for cases filed on or after the date of adjustment.)
- ☐ No
- ☒ Yes. Did you acquire the property covered by the exemption within 1,215 days before you filed this case?
- ☐ No
- ☒ Yes

Fill in this information to identify your case:

Debtor 1 **James Alexander**
 First Name Middle Name Last Name

Debtor 2
 (Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

Case number
 (if known)

☐ Check if this is an amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

	Column A Amount of claim Do not deduct the value of collateral.	Column B Value of collateral that supports this claim	Column C Unsecured portion if any
2.1 JP Morgan Chase Creditor's Name Number, Street, City, State & Zip Code	Describe the property that secures the claim: Other financial account: Funds on deposit with JP Morgan Chase (x6006) As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input checked="" type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset)	\$65,000.00	\$93,197.34
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred Last 4 digits of account number		\$0.00

2.2 JPMCB HOME Creditor's Name 700 KANSAS LN Monroe, LA 71203 Number, Street, City, State & Zip Code	Describe the property that secures the claim: 3551 Dixie Canyon Pl. Sherman Oaks, CA 91423 Los Angeles County As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input checked="" type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset)	\$993,576.00	\$1,260,000.00
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred Last 4 digits of account number		\$0.00

Debtor 1 **James Alexander** Case number (if known) _____
First Name Middle Name Last Name

2.3	Los Angeles County Tax Collector Creditor's Name P.O. Box 54018 Los Angeles, CA 90054-0018 Number, Street, City, State & Zip Code	Describe the property that secures the claim: 3551 Dixie Canyon Pl. Sherman Oaks, CA 91423 Los Angeles County As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input checked="" type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset) _____	Unknown	\$1,260,000.00	Unknown
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Who owes the debt? Check one.
☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred _____ **Last 4 digits of account number** _____

Add the dollar value of your entries in Column A on this page. Write that number here:	\$1,058,576.00
If this is the last page of your form, add the dollar value totals from all pages. Write that number here:	\$1,058,576.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Fill in this information to identify your case:

Debtor 1 **James Alexander**
 First Name Middle Name Last Name

Debtor 2
 (Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

Case number
 (if known)

☐ Check if this is an amended filing

Official Form 106E/F

Schedule E/F: Creditors Who Have Unsecured Claims

12/15

Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY claims and Part 2 for creditors with NONPRIORITY claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on Schedule A/B: Property (Official Form 106A/B) and on Schedule G: Executory Contracts and Unexpired Leases (Official Form 106G). Do not include any creditors with partially secured claims that are listed in Schedule D: Creditors Who Have Claims Secured by Property. If more space is needed, copy the Part you need, fill it out, number the entries in the boxes on the left. Attach the Continuation Page to this page. If you have no information to report in a Part, do not file that Part. On the top of any additional pages, write your name and case number (if known).

Part 1: List All of Your PRIORITY Unsecured Claims

1. Do any creditors have priority unsecured claims against you?

☐ No. Go to Part 2.

☒ Yes.

2. List all of your priority unsecured claims. If a creditor has more than one priority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. If a claim has both priority and nonpriority amounts, list that claim here and show both priority and nonpriority amounts. As much as possible, list the claims in alphabetical order according to the creditor's name. If you have more than two priority unsecured claims, fill out the Continuation Page of Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3.

(For an explanation of each type of claim, see the instructions for this form in the instruction booklet.)

		Total claim	Priority amount	Nonpriority amount
2.1	Franchise Tax Board Priority Creditor's Name Special Procedures POB 2952 Sacramento, CA 95812 Number Street City State Zip Code	Last 4 digits of account number	\$0.00	\$0.00
	When was the debt incurred? As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of PRIORITY unsecured claim: <input type="checkbox"/> Domestic support obligations <input checked="" type="checkbox"/> Taxes and certain other debts you owe the government <input type="checkbox"/> Claims for death or personal injury while you were intoxicated <input type="checkbox"/> Other. Specify			
	Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

For notice purposes only

Debtor 1 **James Alexander**

Case number (if known)

2.2	Internal Revenue Service Priority Creditor's Name Insolvency I Stop 5022 300 N. Los Angeles St., #4062 Los Angeles, CA 90012-9903 Number Street City State Zip Code	Last 4 digits of account number _____ \$0.00	\$0.00	\$0.00
Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of PRIORITY unsecured claim: <input type="checkbox"/> Domestic support obligations <input checked="" type="checkbox"/> Taxes and certain other debts you owe the government <input type="checkbox"/> Claims for death or personal injury while you were intoxicated <input type="checkbox"/> Other. Specify _____		
For notice purposes only				

Part 2: List All of Your NONPRIORITY Unsecured Claims**3. Do any creditors have nonpriority unsecured claims against you?**
☐ No. You have nothing to report in this part. Submit this form to the court with your other schedules.

☒ Yes.
4. List all of your nonpriority unsecured claims in the alphabetical order of the creditor who holds each claim. If a creditor has more than one nonpriority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. Do not list claims already included in Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3. If you have more than three nonpriority unsecured claims fill out the Continuation Page of Part 2.

4.1	Barclay's Bank Delaware Nonpriority Creditor's Name PO BOX 8803 Wilmington, DE 19899 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ \$3,575.43	Total claim \$3,575.43
When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify Credit card			

Debtor 1 **James Alexander**

Case number (if known)

4.2

Buchanon Ingersoll Rooney

Nonpriority Creditor's Name

**919 North Market Street, Suite 990
Wilmington, DE 19801**

Number Street City State Zip Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another
- ☐ **Check if this claim is for a community debt**

Is the claim subject to offset?

- ☒ No
- ☐ Yes

Last 4 digits of account number

\$104,711.01**When was the debt incurred?****As of the date you file, the claim is:** Check all that apply

- ☐ Contingent
- ☐ Unliquidated
- ☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
- ☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
- ☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Legal fees**

4.3

Capital One Bank USA

Nonpriority Creditor's Name

**PO BOX 31293
Salt Lake City, UT 84131**

Number Street City State Zip Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another
- ☐ **Check if this claim is for a community debt**

Is the claim subject to offset?

- ☒ No
- ☐ Yes

Last 4 digits of account number

\$347.00**When was the debt incurred?****As of the date you file, the claim is:** Check all that apply

- ☐ Contingent
- ☐ Unliquidated
- ☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
- ☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
- ☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **credit card**

4.4

Citicard

Nonpriority Creditor's Name

**PO BOX 6241
Sioux Falls, SD 57117**

Number Street City State Zip Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another
- ☐ **Check if this claim is for a community debt**

Is the claim subject to offset?

- ☒ No
- ☐ Yes

Last 4 digits of account number

\$1,513.00**When was the debt incurred?****As of the date you file, the claim is:** Check all that apply

- ☐ Contingent
- ☐ Unliquidated
- ☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
- ☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
- ☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **credit card**

Debtor 1 **James Alexander**

Case number (if known)

4.5

Cred Inc. et al,

Nonpriority Creditor's Name

c/o Scott Cousins, Esq.**1521 Concord Pike, Suite 301****Wilmington, DE 19803**

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No☐ Yes

Last 4 digits of account number

\$0.00

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☒ Contingent☒ Unliquidated☒ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Pending bankruptcy cases**

4.6

Discover Student Loans

Nonpriority Creditor's Name

PO BOX 30948**Salt Lake City, UT 84130**

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No☐ Yes

Last 4 digits of account number

\$86,000.00

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☐ Contingent☐ Unliquidated☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Student loans**

4.7

SOFI

Nonpriority Creditor's Name

2750 E COTTONWOOD PKWY**Salt Lake City, UT 84121**

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No☐ Yes

Last 4 digits of account number

\$4,438.00

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☐ Contingent☐ Unliquidated☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **unsecured loan**

Debtor 1 **James Alexander**

Case number (if known)

4.8

US Bank

Nonpriority Creditor's Name

PO BOX 13**Hillsboro, OH 45133**

Number Street City State Zip Code

Who incurred the debt? Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

\$15,314.00**When was the debt incurred?****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Auto Lease**

4.9

USAA

Nonpriority Creditor's Name

PO BOX 47504**San Antonio, TX 78265**

Number Street City State Zip Code

Who incurred the debt? Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

\$1,471.00**When was the debt incurred?****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Credit card**4.1
0**Wells Fargo Bank**

Nonpriority Creditor's Name

PO BOX 14517**Des Moines, IA 50306**

Number Street City State Zip Code

Who incurred the debt? Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

\$32,260.00**When was the debt incurred?****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **credit card**

Debtor 1 **James Alexander**

Case number (if known)

4.1
1**WF Credit Services**

Last 4 digits of account number

\$5,935.00

Nonpriority Creditor's Name

PO BOX 14517

When was the debt incurred?

Des Moines, IA 50306

Number Street City State Zip Code

As of the date you file, the claim is: Check all that apply

Who incurred the debt? Check one.

☒ Debtor 1 only☐ Contingent☐ Debtor 2 only☐ Unliquidated☐ Debtor 1 and Debtor 2 only☐ Disputed☐ At least one of the debtors and another

Type of NONPRIORITY unsecured claim:

☐ Check if this claim is for a community debt☐ Student loans

Is the claim subject to offset?

☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☒ No☐ Debts to pension or profit-sharing plans, and other similar debts☐ Yes☒ Other. Specify **Credit card****Part 3: List Others to Be Notified About a Debt That You Already Listed**

5. Use this page only if you have others to be notified about your bankruptcy, for a debt that you already listed in Parts 1 or 2. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the original creditor in Parts 1 or 2, then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Parts 1 or 2, list the additional creditors here. If you do not have additional persons to be notified for any debts in Parts 1 or 2, do not fill out or submit this page.

Part 4: Add the Amounts for Each Type of Unsecured Claim

6. Total the amounts of certain types of unsecured claims. This information is for statistical reporting purposes only. 28 U.S.C. §159. Add the amounts for each type of unsecured claim.

Total claims from Part 1			Total Claim	
	6a. Domestic support obligations	6a.	\$	0.00
	6b. Taxes and certain other debts you owe the government	6b.	\$	0.00
	6c. Claims for death or personal injury while you were intoxicated	6c.	\$	0.00
	6d. Other. Add all other priority unsecured claims. Write that amount here.	6d.	\$	0.00
	6e. Total Priority. Add lines 6a through 6d.	6e.	\$	0.00
Total claims from Part 2			Total Claim	
	6f. Student loans	6f.	\$	0.00
	6g. Obligations arising out of a separation agreement or divorce that you did not report as priority claims	6g.	\$	0.00
	6h. Debts to pension or profit-sharing plans, and other similar debts	6h.	\$	0.00
	6i. Other. Add all other nonpriority unsecured claims. Write that amount here.	6i.	\$	255,564.44
	6j. Total Nonpriority. Add lines 6f through 6i.	6j.	\$	255,564.44

Fill in this information to identify your case:

Debtor 1 **James Alexander**
 First Name Middle Name Last Name

Debtor 2
 (Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

Case number
 (if known)

☐ Check if this is an amended filing

Official Form 106G

Schedule G: Executory Contracts and Unexpired Leases

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the additional page, fill it out, number the entries, and attach it to this page. On the top of any additional pages, write your name and case number (if known).

- Do you have any executory contracts or unexpired leases?**
 - ☒ No. Check this box and file this form with the court with your other schedules. You have nothing else to report on this form.
 - ☐ Yes. Fill in all of the information below even if the contacts of leases are listed on *Schedule A/B:Property* (Official Form 106 A/B).
- List separately each person or company with whom you have the contract or lease. Then state what each contract or lease is for (for example, rent, vehicle lease, cell phone).** See the instructions for this form in the instruction booklet for more examples of executory contracts and unexpired leases.

Person or company with whom you have the contract or lease Name, Number, Street, City, State and ZIP Code	State what the contract or lease is for
2.1 Name Number Street City State ZIP Code	
2.2 Name Number Street City State ZIP Code	
2.3 Name Number Street City State ZIP Code	
2.4 Name Number Street City State ZIP Code	
2.5 Name Number Street City State ZIP Code	

Fill in this information to identify your case:

Debtor 1 **James Alexander**
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

Case number
(if known)

☐ Check if this is an amended filing

Official Form 106H Schedule H: Your Codebtors

12/15

Codebtors are people or entities who are also liable for any debts you may have. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, and number the entries in the boxes on the left. Attach the Additional Page to this page. On the top of any Additional Pages, write your name and case number (if known). Answer every question.

1. Do you have any codebtors? (If you are filing a joint case, do not list either spouse as a codebtor.)

- ☒ No
☐ Yes

2. Within the last 8 years, have you lived in a community property state or territory? (Community property states and territories include Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, and Wisconsin.)

- ☒ No. Go to line 3.
☐ Yes. Did your spouse, former spouse, or legal equivalent live with you at the time?

3. In Column 1, list all of your codebtors. Do not include your spouse as a codebtor if your spouse is filing with you. List the person shown in line 2 again as a codebtor only if that person is a guarantor or cosigner. Make sure you have listed the creditor on Schedule D (Official Form 106D), Schedule E/F (Official Form 106E/F), or Schedule G (Official Form 106G). Use Schedule D, Schedule E/F, or Schedule G to fill out Column 2.

Column 1: Your codebtor
Name, Number, Street, City, State and ZIP Code

Column 2: The creditor to whom you owe the debt
Check all schedules that apply:

3.1

Name _____

Number Street
City State ZIP Code

- ☐ Schedule D, line _____
☐ Schedule E/F, line _____
☐ Schedule G, line _____

3.2

Name _____

Number Street
City State ZIP Code

- ☐ Schedule D, line _____
☐ Schedule E/F, line _____
☐ Schedule G, line _____

Fill in this information to identify your case:

Debtor 1 James Alexander

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO

Case number
(If known)

Check if this is:

- ☐ An amended filing
☐ A supplement showing postpetition chapter 13 income as of the following date:

MM / DD / YYYY

Official Form 106I

Schedule I: Your Income

12/15

Be as complete and accurate as possible. If two married people are filing together (Debtor 1 and Debtor 2), both are equally responsible for supplying correct information. If you are married and not filing jointly, and your spouse is living with you, include information about your spouse. If you are separated and your spouse is not filing with you, do not include information about your spouse. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Employment

1. **Fill in your employment information.**

If you have more than one job, attach a separate page with information about additional employers.

Include part-time, seasonal, or self-employed work.

Occupation may include student or homemaker, if it applies.

Employment status

Occupation

Employer's name

Employer's address

How long employed there?

Debtor 1

- ☐ Employed
☒ Not employed

Debtor 2 or non-filing spouse

- ☐ Employed
☐ Not employed

Part 2: Give Details About Monthly Income

Estimate monthly income as of the date you file this form. If you have nothing to report for any line, write \$0 in the space. Include your non-filing spouse unless you are separated.

If you or your non-filing spouse have more than one employer, combine the information for all employers for that person on the lines below. If you need more space, attach a separate sheet to this form.

	For Debtor 1	For Debtor 2 or non-filing spouse
2. List monthly gross wages, salary, and commissions (before all payroll deductions). If not paid monthly, calculate what the monthly wage would be.	2. \$ <u>0.00</u>	\$ <u>N/A</u>
3. Estimate and list monthly overtime pay.	3. +\$ <u>0.00</u>	+\$ <u>N/A</u>
4. Calculate gross income. Add line 2 + line 3.	4. \$ <u>0.00</u>	\$ <u>N/A</u>

Debtor 1 **James Alexander**

Case number (if known)

	For Debtor 1	For Debtor 2 or non-filing spouse
Copy line 4 here	4. \$ 0.00	\$ N/A
5. List all payroll deductions:		
5a. Tax, Medicare, and Social Security deductions	5a. \$ 0.00	\$ N/A
5b. Mandatory contributions for retirement plans	5b. \$ 0.00	\$ N/A
5c. Voluntary contributions for retirement plans	5c. \$ 0.00	\$ N/A
5d. Required repayments of retirement fund loans	5d. \$ 0.00	\$ N/A
5e. Insurance	5e. \$ 0.00	\$ N/A
5f. Domestic support obligations	5f. \$ 0.00	\$ N/A
5g. Union dues	5g. \$ 0.00	\$ N/A
5h. Other deductions. Specify:	5h.+ \$ 0.00	\$ N/A
6. Add the payroll deductions. Add lines 5a+5b+5c+5d+5e+5f+5g+5h.	6. \$ 0.00	\$ N/A
7. Calculate total monthly take-home pay. Subtract line 6 from line 4.	7. \$ 0.00	\$ N/A
8. List all other income regularly received:		
8a. Net income from rental property and from operating a business, profession, or farm Attach a statement for each property and business showing gross receipts, ordinary and necessary business expenses, and the total monthly net income.	8a. \$ 0.00	\$ N/A
8b. Interest and dividends	8b. \$ 0.00	\$ N/A
8c. Family support payments that you, a non-filing spouse, or a dependent regularly receive Include alimony, spousal support, child support, maintenance, divorce settlement, and property settlement.	8c. \$ 0.00	\$ N/A
8d. Unemployment compensation	8d. \$ 0.00	\$ N/A
8e. Social Security	8e. \$ 0.00	\$ N/A
8f. Other government assistance that you regularly receive Include cash assistance and the value (if known) of any non-cash assistance that you receive, such as food stamps (benefits under the Supplemental Nutrition Assistance Program) or housing subsidies. Specify:	8f. \$ 0.00	\$ N/A
8g. Pension or retirement income	8g. \$ 0.00	\$ N/A
8h. Other monthly income. Specify:	8h.+ \$ 0.00	\$ N/A
9. Add all other income. Add lines 8a+8b+8c+8d+8e+8f+8g+8h.	9. \$ 0.00	\$ N/A
10. Calculate monthly income. Add line 7 + line 9. Add the entries in line 10 for Debtor 1 and Debtor 2 or non-filing spouse.	10. \$ 0.00 + \$ N/A = \$ 0.00	
11. State all other regular contributions to the expenses that you list in Schedule J. Include contributions from an unmarried partner, members of your household, your dependents, your roommates, and other friends or relatives. Do not include any amounts already included in lines 2-10 or amounts that are not available to pay expenses listed in Schedule J. Specify:	11. +\$ 0.00	
12. Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income. Write that amount on the Summary of Schedules and Statistical Summary of Certain Liabilities and Related Data, if it applies	12. \$ 0.00	Combined monthly income
13. Do you expect an increase or decrease within the year after you file this form?		
<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Explain:		

Fill in this information to identify your case:

Debtor 1 James Alexander

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO

Case number _____
(If known)

Check if this is:

- ☐ An amended filing
- ☐ A supplement showing postpetition chapter 13 expenses as of the following date:

MM / DD / YYYY

Official Form 106J

Schedule J: Your Expenses

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach another sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Your Household

1. Is this a joint case?

☒ No. Go to line 2.

☐ Yes. Does Debtor 2 live in a separate household?

☐ No

☐ Yes. Debtor 2 must file Official Form 106J-2, *Expenses for Separate Household* of Debtor 2.

2. Do you have dependents? ☐ No

Do not list Debtor 1 and Debtor 2.

☒ Yes. Fill out this information for each dependent.....

Dependent's relationship to Debtor 1 or Debtor 2

Dependent's age

Does dependent live with you?

Do not state the dependents names.

child

1.5

☐ No

☒ Yes

Child

1.5

☐ No

☒ Yes

☐ No

☐ Yes

☐ No

☐ Yes

3. Do your expenses include expenses of people other than yourself and your dependents? ☒ No ☐ Yes

Part 2: Estimate Your Ongoing Monthly Expenses

Estimate your expenses as of your bankruptcy filing date unless you are using this form as a supplement in a Chapter 13 case to report expenses as of a date after the bankruptcy is filed. If this is a supplemental *Schedule J*, check the box at the top of the form and fill in the applicable date.

Include expenses paid for with non-cash government assistance if you know the value of such assistance and have included it on *Schedule I: Your Income* (Official Form 106I.)

Your expenses

4. The rental or home ownership expenses for your residence. Include first mortgage payments and any rent for the ground or lot.

4. \$ 4,885.27

If not included in line 4:

4a. Real estate taxes

4a. \$ 1,312.50

4b. Property, homeowner's, or renter's insurance

4b. \$ 180.96

4c. Home maintenance, repair, and upkeep expenses

4c. \$ 1,150.00

4d. Homeowner's association or condominium dues

4d. \$ 0.00

5. Additional mortgage payments for your residence, such as home equity loans

5. \$ 0.00

Debtor 1 **James Alexander**

Case number (if known)

6. Utilities:								
6a. Electricity, heat, natural gas	6a. \$	554.46						
6b. Water, sewer, garbage collection	6b. \$	0.00						
6c. Telephone, cell phone, Internet, satellite, and cable services	6c. \$	490.00						
6d. Other. Specify: _____	6d. \$	0.00						
7. Food and housekeeping supplies	7. \$	1,300.00						
8. Childcare and children's education costs	8. \$	0.00						
9. Clothing, laundry, and dry cleaning	9. \$	100.00						
10. Personal care products and services	10. \$	100.00						
11. Medical and dental expenses	11. \$	380.00						
12. Transportation. Include gas, maintenance, bus or train fare. Do not include car payments.	12. \$	560.00						
13. Entertainment, clubs, recreation, newspapers, magazines, and books	13. \$	100.00						
14. Charitable contributions and religious donations	14. \$	20.00						
15. Insurance. Do not include insurance deducted from your pay or included in lines 4 or 20.								
15a. Life insurance	15a. \$	0.00						
15b. Health insurance	15b. \$	1,605.14						
15c. Vehicle insurance	15c. \$	1,115.68						
15d. Other insurance. Specify: _____	15d. \$	0.00						
16. Taxes. Do not include taxes deducted from your pay or included in lines 4 or 20. Specify: _____								
	16. \$	0.00						
17. Installment or lease payments:								
17a. Car payments for Vehicle 1	17a. \$	1,146.15						
17b. Car payments for Vehicle 2	17b. \$	0.00						
17c. Other. Specify: _____	17c. \$	0.00						
17d. Other. Specify: _____	17d. \$	0.00						
18. Your payments of alimony, maintenance, and support that you did not report as deducted from your pay on line 5, Schedule I, Your Income (Official Form 106I).	18. \$	0.00						
19. Other payments you make to support others who do not live with you.	\$	0.00						
Specify: _____	19.							
20. Other real property expenses not included in lines 4 or 5 of this form or on Schedule I: Your Income.								
20a. Mortgages on other property	20a. \$	0.00						
20b. Real estate taxes	20b. \$	0.00						
20c. Property, homeowner's, or renter's insurance	20c. \$	0.00						
20d. Maintenance, repair, and upkeep expenses	20d. \$	0.00						
20e. Homeowner's association or condominium dues	20e. \$	0.00						
21. Other: Specify: _____	21. +\$	0.00						
22. Calculate your monthly expenses								
22a. Add lines 4 through 21.	<div style="border: 1px solid black; padding: 5px;"> <table border="0"> <tr> <td>\$</td> <td>15,000.16</td> </tr> <tr> <td>\$</td> <td></td> </tr> <tr> <td>\$</td> <td>15,000.16</td> </tr> </table> </div>		\$	15,000.16	\$		\$	15,000.16
\$			15,000.16					
\$								
\$	15,000.16							
22b. Copy line 22 (monthly expenses for Debtor 2), if any, from Official Form 106J-2								
22c. Add line 22a and 22b. The result is your monthly expenses.								
23. Calculate your monthly net income.								
23a. Copy line 12 (your combined monthly income) from Schedule I.	23a. \$	0.00						
23b. Copy your monthly expenses from line 22c above.	23b. -\$	15,000.16						
23c. Subtract your monthly expenses from your monthly income. The result is your <i>monthly net income</i> .	23c. \$	-15,000.16						
24. Do you expect an increase or decrease in your expenses within the year after you file this form? For example, do you expect to finish paying for your car loan within the year or do you expect your mortgage payment to increase or decrease because of a modification to the terms of your mortgage?								
<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Explain here:								

Fill in this information to identify your case:

Debtor 1 James Alexander
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO

Case number
(if known) _____

☐ Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person _____

Attach *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X

James Alexander
Signature of Debtor 1

Date February 22, 2021

X

Signature of Debtor 2

Date _____

Fill in this information to identify your case:

Debtor 1 **James Alexander**
First Name Middle Name Last Name
Debtor 2
(Spouse if, filing) First Name Middle Name Last Name
United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**
Case number
(if known)

☐ Check if this is an amended filing

Official Form 107

Statement of Financial Affairs for Individuals Filing for Bankruptcy

4/19

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Give Details About Your Marital Status and Where You Lived Before

1. What is your current marital status?

- ☒ Married
☐ Not married

2. During the last 3 years, have you lived anywhere other than where you live now?

- ☐ No
☒ Yes. List all of the places you lived in the last 3 years. Do not include where you live now.

Debtor 1 Prior Address:

**4501 Finley Ave, #406
Los Angeles, CA 90025**

Dates Debtor 1
lived there

From-To:
1/12/16-2/1/20

Debtor 2 Prior Address:

☐ Same as Debtor 1

Dates Debtor 2
lived there

☐ Same as Debtor 1
From-To:

3. Within the last 8 years, did you ever live with a spouse or legal equivalent in a community property state or territory? (Community property states and territories include Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington and Wisconsin.)

- ☒ No
☐ Yes. Make sure you fill out *Schedule H: Your Codebtors* (Official Form 106H).

Part 2 Explain the Sources of Your Income

4. Did you have any income from employment or from operating a business during this year or the two previous calendar years?

Fill in the total amount of income you received from all jobs and all businesses, including part-time activities. If you are filing a joint case and you have income that you receive together, list it only once under Debtor 1.

- ☐ No
☒ Yes. Fill in the details.

Debtor 1

Sources of income
Check all that apply.

Gross income
(before deductions and
exclusions)

\$30,000.00

- ☒ Wages, commissions,
bonuses, tips
☐ Operating a business

Debtor 2

Sources of income
Check all that apply.

Gross income
(before deductions and
exclusions)

- ☐ Wages, commissions,
bonuses, tips
☐ Operating a business

From January 1 of current year until
the date you filed for bankruptcy:

Debtor 1 **James Alexander**

Case number (if known)

	Debtor 1		Debtor 2	
	Sources of income Check all that apply.	Gross income (before deductions and exclusions)	Sources of income Check all that apply.	Gross income (before deductions and exclusions)
For last calendar year: (January 1 to December 31, 2020)	<input checked="" type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business	\$340,000.00	<input type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business	
For the calendar year before that: (January 1 to December 31, 2019)	<input checked="" type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business	\$120,000.00	<input type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business	

5. Did you receive any other income during this year or the two previous calendar years?

Include income regardless of whether that income is taxable. Examples of *other income* are alimony; child support; Social Security, unemployment, and other public benefit payments; pensions; rental income; interest; dividends; money collected from lawsuits; royalties; and gambling and lottery winnings. If you are filing a joint case and you have income that you received together, list it only once under Debtor 1.

List each source and the gross income from each source separately. Do not include income that you listed in line 4.

- ☒ No
☐ Yes. Fill in the details.

Debtor 1		Debtor 2	
Sources of income Describe below.	Gross income from each source (before deductions and exclusions)	Sources of income Describe below.	Gross income (before deductions and exclusions)

Part 3: List Certain Payments You Made Before You Filed for Bankruptcy**6. Are either Debtor 1's or Debtor 2's debts primarily consumer debts?**

- ☒ No. **Neither Debtor 1 nor Debtor 2 has primarily consumer debts.** *Consumer debts* are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."

During the 90 days before you filed for bankruptcy, did you pay any creditor a total of \$6,825* or more?

- ☐ No. Go to line 7.
☒ Yes. List below each creditor to whom you paid a total of \$6,825* or more in one or more payments and the total amount you paid that creditor. Do not include payments for domestic support obligations, such as child support and alimony. Also, do not include payments to an attorney for this bankruptcy case.

* Subject to adjustment on 4/01/22 and every 3 years after that for cases filed on or after the date of adjustment.

- ☐ Yes. **Debtor 1 or Debtor 2 or both have primarily consumer debts.**

During the 90 days before you filed for bankruptcy, did you pay any creditor a total of \$600 or more?

- ☐ No. Go to line 7.
☐ Yes. List below each creditor to whom you paid a total of \$600 or more and the total amount you paid that creditor. Do not include payments for domestic support obligations, such as child support and alimony. Also, do not include payments to an attorney for this bankruptcy case.

Creditor's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Was this payment for ...
Chase Home Services 700 Kansas Lane Monroe, LA 71203	1/21/2021	\$34,196.89	\$1,046,674.29	<input checked="" type="checkbox"/> Mortgage <input type="checkbox"/> Car <input type="checkbox"/> Credit Card <input type="checkbox"/> Loan Repayment <input type="checkbox"/> Suppliers or vendors <input type="checkbox"/> Other___

Debtor 1 **James Alexander**

Case number (if known)

Creditor's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Was this payment for ...
Chase Credit Card PO Box 6294 Carol Stream, IL 60197	1/19/2021	\$11,523.92	\$1,460.00	<input type="checkbox"/> Mortgage <input type="checkbox"/> Car <input checked="" type="checkbox"/> Credit Card <input type="checkbox"/> Loan Repayment <input type="checkbox"/> Suppliers or vendors <input type="checkbox"/> Other ____
Cultural Care Au Pere 1 Education Street Cambridge, MA 02141	12/23/220	\$14,947.58	\$0.00	<input type="checkbox"/> Mortgage <input type="checkbox"/> Car <input type="checkbox"/> Credit Card <input type="checkbox"/> Loan Repayment <input type="checkbox"/> Suppliers or vendors <input checked="" type="checkbox"/> Other <u>childcare</u>

7. **Within 1 year before you filed for bankruptcy, did you make a payment on a debt you owed anyone who was an insider?**
Insiders include your relatives; any general partners; relatives of any general partners; partnerships of which you are a general partner; corporations of which you are an officer, director, person in control, or owner of 20% or more of their voting securities; and any managing agent, including one for a business you operate as a sole proprietor. 11 U.S.C. § 101. Include payments for domestic support obligations, such as child support and alimony.

- ☒ No
☐ Yes. List all payments to an insider.

Insider's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Reason for this payment
----------------------------	------------------	-------------------	----------------------	-------------------------

8. **Within 1 year before you filed for bankruptcy, did you make any payments or transfer any property on account of a debt that benefited an insider?**
 Include payments on debts guaranteed or cosigned by an insider.

- ☒ No
☐ Yes. List all payments to an insider

Insider's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Reason for this payment Include creditor's name
----------------------------	------------------	-------------------	----------------------	--

Part 4: Identify Legal Actions, Repossessions, and Foreclosures

9. **Within 1 year before you filed for bankruptcy, were you a party in any lawsuit, court action, or administrative proceeding?**
 List all such matters, including personal injury cases, small claims actions, divorces, collection suits, paternity actions, support or custody modifications, and contract disputes.

- ☐ No
☒ Yes. Fill in the details.

Case title Case number	Nature of the case	Court or agency	Status of the case
CRED INC., CRED CAPITAL, INC., and CRED (US) LLC vs. James Alexander Adv. Proc. No: 20-51006	Turnover	US Bankruptcy Court - Delaware	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
Cred Inc. (f/k/a Cred LLC) and Cred Capital, Inc. v. James Alexander 20-CIV-02915	Turnover	Superior Court of California	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded

Debtor 1 **James Alexander**

10. **Within 1 year before you filed for bankruptcy, was any of your property repossessed, foreclosed, garnished, attached, seized, or levied?**
Check all that apply and fill in the details below.

- ☒ No. Go to line 11.
☐ Yes. Fill in the information below.

Creditor Name and Address	Describe the Property Explain what happened	Date	Value of the property
---------------------------	--	------	-----------------------

11. **Within 90 days before you filed for bankruptcy, did any creditor, including a bank or financial institution, set off any amounts from your accounts or refuse to make a payment because you owed a debt?**

- ☒ No
☐ Yes. Fill in the details.

Creditor Name and Address	Describe the action the creditor took	Date action was taken	Amount
---------------------------	---------------------------------------	-----------------------	--------

12. **Within 1 year before you filed for bankruptcy, was any of your property in the possession of an assignee for the benefit of creditors, a court-appointed receiver, a custodian, or another official?**

- ☒ No
☐ Yes

Part 5: List Certain Gifts and Contributions

13. **Within 2 years before you filed for bankruptcy, did you give any gifts with a total value of more than \$600 per person?**

- ☒ No
☐ Yes. Fill in the details for each gift.

Gifts with a total value of more than \$600 per person	Describe the gifts	Dates you gave the gifts	Value
Person to Whom You Gave the Gift and Address:			

14. **Within 2 years before you filed for bankruptcy, did you give any gifts or contributions with a total value of more than \$600 to any charity?**

- ☐ No
☒ Yes. Fill in the details for each gift or contribution.

Gifts or contributions to charities that total more than \$600 Charity's Name Address (Number, Street, City, State and ZIP Code)	Describe what you contributed	Dates you contributed	Value
St. Sophia cathedral 1324 Normandy Ave Los Angeles, CA 90006	monthly parish contribution	1/11/2020	\$2,000.00

Part 6: List Certain Losses

15. **Within 1 year before you filed for bankruptcy or since you filed for bankruptcy, did you lose anything because of theft, fire, other disaster, or gambling?**

- ☒ No
☐ Yes. Fill in the details.

Describe the property you lost and how the loss occurred	Describe any insurance coverage for the loss Include the amount that insurance has paid. List pending insurance claims on line 33 of <i>Schedule A/B: Property</i> .	Date of your loss	Value of property lost
--	---	-------------------	------------------------

Debtor 1 **James Alexander**

Case number (if known)

Part 7: List Certain Payments or Transfers

16. Within 1 year before you filed for bankruptcy, did you or anyone else acting on your behalf pay or transfer any property to anyone you consulted about seeking bankruptcy or preparing a bankruptcy petition?

Include any attorneys, bankruptcy petition preparers, or credit counseling agencies for services required in your bankruptcy.

☐ No

☒ Yes. Fill in the details.

Person Who Was Paid Address Email or website address Person Who Made the Payment, if Not You	Description and value of any property transferred	Date payment or transfer was made	Amount of payment
Levene, Neale, Bender, Yoo & Brill L.L.P. 10250 Constellation Blvd. # 1700 Los Angeles, CA 90067 http://www.lnbyb.com	\$20,000	2/4/2021	\$20,000.00

17. Within 1 year before you filed for bankruptcy, did you or anyone else acting on your behalf pay or transfer any property to anyone who promised to help you deal with your creditors or to make payments to your creditors?

Do not include any payment or transfer that you listed on line 16.

☒ No

☐ Yes. Fill in the details.

Person Who Was Paid Address	Description and value of any property transferred	Date payment or transfer was made	Amount of payment
--------------------------------	---	-----------------------------------	-------------------

18. Within 2 years before you filed for bankruptcy, did you sell, trade, or otherwise transfer any property to anyone, other than property transferred in the ordinary course of your business or financial affairs?

Include both outright transfers and transfers made as security (such as the granting of a security interest or mortgage on your property). Do not include gifts and transfers that you have already listed on this statement.

☒ No

☐ Yes. Fill in the details.

Person Who Received Transfer Address Person's relationship to you	Description and value of property transferred	Describe any property or payments received or debts paid in exchange	Date transfer was made
---	---	--	------------------------

19. Within 10 years before you filed for bankruptcy, did you transfer any property to a self-settled trust or similar device of which you are a beneficiary? (These are often called *asset-protection devices*.)

☒ No

☐ Yes. Fill in the details.

Name of trust	Description and value of the property transferred	Date Transfer was made
---------------	---	------------------------

Part 8: List of Certain Financial Accounts, Instruments, Safe Deposit Boxes, and Storage Units

20. Within 1 year before you filed for bankruptcy, were any financial accounts or instruments held in your name, or for your benefit, closed, sold, moved, or transferred?

Include checking, savings, money market, or other financial accounts; certificates of deposit; shares in banks, credit unions, brokerage houses, pension funds, cooperatives, associations, and other financial institutions.

☒ No

☐ Yes. Fill in the details.

Name of Financial Institution and Address (Number, Street, City, State and ZIP Code)	Last 4 digits of account number	Type of account or instrument	Date account was closed, sold, moved, or transferred	Last balance before closing or transfer
--	---------------------------------	-------------------------------	--	---

Debtor 1 **James Alexander**

21. Do you now have, or did you have within 1 year before you filed for bankruptcy, any safe deposit box or other depository for securities, cash, or other valuables?

- ☐ No
☐ Yes. Fill in the details.

Name of Financial Institution Address (Number, Street, City, State and ZIP Code)	Who else had access to it? Address (Number, Street, City, State and ZIP Code)	Describe the contents	Do you still have it?
---	--	-----------------------	-----------------------

22. Have you stored property in a storage unit or place other than your home within 1 year before you filed for bankruptcy?

- ☐ No
☐ Yes. Fill in the details.

Name of Storage Facility Address (Number, Street, City, State and ZIP Code)	Who else has or had access to it? Address (Number, Street, City, State and ZIP Code)	Describe the contents	Do you still have it?
--	---	-----------------------	-----------------------

Part 9: Identify Property You Hold or Control for Someone Else

23. Do you hold or control any property that someone else owns? Include any property you borrowed from, are storing for, or hold in trust for someone.

- ☐ No
☐ Yes. Fill in the details.

Owner's Name Address (Number, Street, City, State and ZIP Code)	Where is the property? (Number, Street, City, State and ZIP Code)	Describe the property	Value
--	--	-----------------------	-------

Part 10: Give Details About Environmental Information

For the purpose of Part 10, the following definitions apply:

- ☐ **Environmental law** means any federal, state, or local statute or regulation concerning pollution, contamination, releases of hazardous or toxic substances, wastes, or material into the air, land, soil, surface water, groundwater, or other medium, including statutes or regulations controlling the cleanup of these substances, wastes, or material.
- ☐ **Site** means any location, facility, or property as defined under any environmental law, whether you now own, operate, or utilize it or used to own, operate, or utilize it, including disposal sites.
- ☐ **Hazardous material** means anything an environmental law defines as a hazardous waste, hazardous substance, toxic substance, hazardous material, pollutant, contaminant, or similar term.

Report all notices, releases, and proceedings that you know about, regardless of when they occurred.

24. Has any governmental unit notified you that you may be liable or potentially liable under or in violation of an environmental law?

- ☐ No
☐ Yes. Fill in the details.

Name of site Address (Number, Street, City, State and ZIP Code)	Governmental unit Address (Number, Street, City, State and ZIP Code)	Environmental law, if you know it	Date of notice
--	---	-----------------------------------	----------------

25. Have you notified any governmental unit of any release of hazardous material?

- ☐ No
☐ Yes. Fill in the details.

Name of site Address (Number, Street, City, State and ZIP Code)	Governmental unit Address (Number, Street, City, State and ZIP Code)	Environmental law, if you know it	Date of notice
--	---	-----------------------------------	----------------

Debtor 1 **James Alexander**

Case number (if known)

26. Have you been a party in any judicial or administrative proceeding under any environmental law? Include settlements and orders.

- ☒ No
☐ Yes. Fill in the details.

Case Title Case Number	Court or agency Name Address (Number, Street, City, State and ZIP Code)	Nature of the case	Status of the case

Part 11: Give Details About Your Business or Connections to Any Business

27. Within 4 years before you filed for bankruptcy, did you own a business or have any of the following connections to any business?

- ☐ A sole proprietor or self-employed in a trade, profession, or other activity, either full-time or part-time
☐ A member of a limited liability company (LLC) or limited liability partnership (LLP)
☐ A partner in a partnership
☒ An officer, director, or managing executive of a corporation
☒ An owner of at least 5% of the voting or equity securities of a corporation

☐ No. None of the above applies. Go to Part 12.

☒ Yes. Check all that apply above and fill in the details below for each business.

Business Name Address (Number, Street, City, State and ZIP Code)	Describe the nature of the business Name of accountant or bookkeeper	Employer Identification number Do not include Social Security number or ITIN. Dates business existed EIN: From-To
Cred Capital, Inc. 2121 S. El Camino Real San Mateo, CA 94403	investment management Joe Podulka	81-1117798 From-To 3/15/2020 -1/7/2020
A Capital A, Inc. 4501 Finley Ave, Apt 406 Los Angeles, CA 90027	Consulting Alex fard	EIN: 81-1117798 From-To 1/1/2014 - 12/31/2018

28. Within 2 years before you filed for bankruptcy, did you give a financial statement to anyone about your business? Include all financial institutions, creditors, or other parties.

- ☒ No
☐ Yes. Fill in the details below.

Name Address (Number, Street, City, State and ZIP Code)	Date Issued

Part 12: Sign Below

I have read the answers on this *Statement of Financial Affairs* and any attachments, and I declare under penalty of perjury that the answers are true and correct. I understand that making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

James Alexander
Signature of Debtor 1

Signature of Debtor 2

Date February 22, 2021

Date

Did you attach additional pages to *Your Statement of Financial Affairs for Individuals Filing for Bankruptcy* (Official Form 107)?

- ☒ No
☐ Yes

Did you pay or agree to pay someone who is not an attorney to help you fill out bankruptcy forms?

- ☒ No

Debtor 1 James Alexander Case number (if known) _____

☐ Yes. Name of Person _____. Attach the *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119).

Fill in this information to identify your case:

37 of 46

Debtor 1 James Alexander
First Name Middle Name Last Name

Debtor 2
 (Spouse, if filing)
First Name Middle Name Last Name

United States Bankruptcy Court for the: Central District of California

Case number 1:21-bk-10214-MB
 (if known)

☐ Check if this is an amended filing

Official Form 122B

Chapter 11 Statement of Your Current Monthly Income

04/20

You must file this form if you are an individual and are filing for bankruptcy under Chapter 11. If more space is needed, attach a separate sheet to this form. Include the line number to which the additional information applies. On the top of any additional pages, write your name and case number (if known).

Part 1: Calculate Your Current Monthly Income

1. What is your marital and filing status? Check one only.

- ☐ Not married. Fill out Column A, lines 2-11.
- ☐ Married and your spouse is filing with you. Fill out both Columns A and B, lines 2-11.
- ☒ Married and your spouse is NOT filing with you. Fill out Column A, lines 2-11.

Fill in the average monthly income that you received from all sources, derived during the 6 full months before you file this bankruptcy case. 11 U.S.C. § 101(10A). For example, if you are filing on September 15, the 6-month period would be March 1 through August 31. If the amount of your monthly income varied during the 6 months, add the income for all 6 months and divide the total by 6. Fill in the result. Do not include any income amount more than once. For example, if both spouses own the same rental property, put the income from that property in one column only. If you have nothing to report for any line, write \$0 in the space.

Column A Debtor 1	Column B Debtor 2
----------------------	----------------------

- | 2. Your gross wages, salary, tips, bonuses, overtime, and commissions (before all payroll deductions). | \$ 0.00 | \$ | | | | | | | | |
|--|--|----------|----------|--|------------|---|-----------|---|------------|---------------------------|
| 3. Alimony and maintenance payments. Do not include payments from a spouse if Column B is filled in. | \$ 0.00 | \$ | | | | | | | | |
| 4. All amounts from any source which are regularly paid for household expenses of you or your dependents, including child support. Include regular contributions from an unmarried partner, members of your household, your dependents, parents, and roommates. Include regular contributions from a spouse only if Column B is not filled in. Do not include payments you listed on line 3. | \$ 0.00 | \$ | | | | | | | | |
| 5. Net income from operating a business, profession, or farm | <table border="1"> <thead> <tr> <th>Debtor 1</th> <th>Debtor 2</th> </tr> </thead> <tbody> <tr> <td>Gross receipts (before all deductions)</td> <td>\$ 0.00 \$</td> </tr> <tr> <td>Ordinary and necessary operating expenses</td> <td>– \$ – \$</td> </tr> <tr> <td>Net monthly income from a business, profession, or farm</td> <td>\$ 0.00 \$</td> </tr> </tbody> </table> | Debtor 1 | Debtor 2 | Gross receipts (before all deductions) | \$ 0.00 \$ | Ordinary and necessary operating expenses | – \$ – \$ | Net monthly income from a business, profession, or farm | \$ 0.00 \$ | Copy here →
\$ 0.00 \$ |
| Debtor 1 | Debtor 2 | | | | | | | | | |
| Gross receipts (before all deductions) | \$ 0.00 \$ | | | | | | | | | |
| Ordinary and necessary operating expenses | – \$ – \$ | | | | | | | | | |
| Net monthly income from a business, profession, or farm | \$ 0.00 \$ | | | | | | | | | |
| 6. Net income from rental and other real property | <table border="1"> <thead> <tr> <th>Debtor 1</th> <th>Debtor 2</th> </tr> </thead> <tbody> <tr> <td>Gross receipts (before all deductions)</td> <td>\$ 0.00 \$</td> </tr> <tr> <td>Ordinary and necessary operating expenses</td> <td>– \$ – \$</td> </tr> <tr> <td>Net monthly income from rental or other real property</td> <td>\$ 0.00 \$</td> </tr> </tbody> </table> | Debtor 1 | Debtor 2 | Gross receipts (before all deductions) | \$ 0.00 \$ | Ordinary and necessary operating expenses | – \$ – \$ | Net monthly income from rental or other real property | \$ 0.00 \$ | Copy here →
\$ 0.00 \$ |
| Debtor 1 | Debtor 2 | | | | | | | | | |
| Gross receipts (before all deductions) | \$ 0.00 \$ | | | | | | | | | |
| Ordinary and necessary operating expenses | – \$ – \$ | | | | | | | | | |
| Net monthly income from rental or other real property | \$ 0.00 \$ | | | | | | | | | |

Debtor 1 **James Alexander** Case number (if known) **1:21-bk-10214-MB**
 First Name Middle Name Last Name

7. **Interest, dividends, and royalties**

Column A
Debtor 1 \$ 135.00 Column B
Debtor 2 \$ _____

8. **Unemployment compensation**

\$ 0.00 \$ _____

Do not enter the amount if you contend that the amount received was a benefit under the Social Security Act. Instead, list it here:..... ↓

For you \$ 0.00

For your spouse \$ _____

9. **Pension or retirement income.** Do not include any amount received that was a benefit under the Social Security Act. Also, except as stated in the next sentence, do not include any compensation, pension, pay, annuity, or allowance paid by the United States Government in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services. If you received any retired pay paid under chapter 61 of title 10, then include that pay only to the extent that it does not exceed the amount of retired pay to which you would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title.

\$ 0.00 \$ _____

10. **Income from all other sources not listed above.** Specify the source and amount. Do not include any benefits received under the Social Security Act; payments made under the Federal law relating to the national emergency declared by the President under the National Emergencies Act (50 U.S.C. 1601 et seq.) with respect to the coronavirus disease 2019 (COVID-19); payments received as a victim of a war crime, a crime against humanity, or international or domestic terrorism; or compensation, pension, pay, annuity, or allowance paid by the United States Government in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services. If necessary, list other sources on a separate page and put the total below.

_____ \$ 0.00 \$ _____

_____ \$ _____ \$ _____

Total amounts from separate pages, if any. + \$ _____ + \$ _____

11. **Calculate your total current monthly income.**

Add lines 2 through 10 for each column.
 Then add the total for Column A to the total for Column B.

\$ 135.00 + \$ _____ = \$ 135.00
 Total current monthly income

Part 2: Sign Below

By signing here, under penalty of perjury I declare that the information on this statement and in any attachments is true and correct.

X

Signature of Debtor 1

Date 02/23/2021
 MM / DD / YYYY

X

Signature of Debtor 2

Date _____
 MM / DD / YYYY

United States Bankruptcy Court
Central District of California - San Fernando

In re **James Alexander**

Debtor(s)

Case No.

Chapter

11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$	20,000.00
Prior to the filing of this statement I have received	\$	20,000.00
Balance Due	\$	0.00

2. \$ **1,738.00** of the filing fee has been paid.
3. The source of the compensation paid to me was:
- ☒ Debtor ☐ Other (specify):
4. The source of compensation to be paid to me is:
- ☒ Debtor ☐ Other (specify):
5. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.
- ☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.
6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:
- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
 - b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
 - c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
 - d. Representation of the debtor in adversary proceedings and other contested bankruptcy matters;
 - e. [Other provisions as needed]

Advising the Debtor with regard to the requirements of the Bankruptcy Court, Bankruptcy Code, Bankruptcy Rules and the Office of the United States Trustee as they pertain to the Debtor; advising the Debtor with regard to certain rights and remedies of its bankruptcy estate and the rights, claims and interests of creditors; representing the Chapter 11 Debtor in any proceeding or hearing in the Bankruptcy Court involving its estate unless the Debtor is represented in such proceeding or hearing by other special counsel; conducting examinations of witnesses, claimants or adverse parties and representing the Debtor in any adversary proceeding except to the extent that any such adversary proceeding is in an area outside of LNBYB's expertise or which is beyond LNBYB's staffing capabilities; preparing and assisting the Debtor in the preparation of reports, applications, pleadings and orders including, but not limited to, applications to employ professionals, interim statements and operating reports, initial filing requirements, schedules and statement of financial affairs, lease pleadings, cash collateral pleadings, financing pleadings, and pleadings with respect to the Debtor's use, sale or lease of property outside the ordinary course of business; representing the Debtor with regard to obtaining use of debtor in possession financing and/or cash collateral including, but not limited to, negotiating and seeking Bankruptcy Court approval of any debtor in possession financing and/or cash collateral pleading or stipulation and preparing any pleadings relating to obtaining use of debtor in possession financing and/or cash collateral; assisting the Debtor in the negotiation, formulation, preparation and confirmation of a plan of reorganization and the preparation and approval of a disclosure statement in respect of the plan; and performing any other services which may be appropriate in LNBYB's representation of the Debtor in Possession during the Chapter 11 bankruptcy case.

7. By agreement with the debtor(s), the above-disclosed fee does not include the following service:
- Matters which are outside of LNBYB's specialization, any matters outside of a Chapter 11 proceeding and any nondischargeability investigation or litigation**

In re **James Alexander**

Debtor(s)

Case No. **1:21-bk-10214-MB**

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)
(Continuation Sheet)

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

February 23, 2021

Date

/s/ David B. Golubchik

David B. Golubchik 185520

Signature of Attorney

Levene, Neale, Bender, Yoo & Brill L.L.P.

10250 Constellation Blvd., Suite 1700

Los Angeles, CA 90067

(310) 229-1234

Name of law firm

Attorney or Party Name, Address, Telephone & FAX Nos.,
 State Bar No. & Email Address
David B. Golubchik 185520
10250 Constellation Blvd., Suite 1700
Los Angeles, CA 90067
(310) 229-1234
 California State Bar Number: **185520 CA**

FOR COURT USE ONLY

☐ Debtor(s) appearing without an attorney

☒ Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
 CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO**

In re:

James Alexander

CASE NO.:

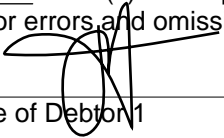
CHAPTER: 11

**VERIFICATION OF MASTER
 MAILING LIST OF CREDITORS**

[LBR 1007-1(a)]

Debtor(s).

Pursuant to LBR 1007-1(a), the Debtor, or the Debtor's attorney if applicable, certifies under penalty of perjury that the master mailing list of creditors filed in this bankruptcy case, consisting of 3 sheet(s) is complete, correct, and consistent with the Debtor's schedules and I/we assume all responsibility for errors and omissions.

Date: **February 22, 2021**

 Signature of Debtor 1

Date: _____

Signature of Debtor 2 (joint debtor)) (if applicable)

Date: **February 22, 2021**

Signature of Attorney for Debtor (if applicable)

James Alexander
13535 Ventura Blvd
Ste C, PMB 405
Sherman Oaks, CA 91423

David B. Golubchik
Levene, Neale, Bender, Yoo & Brill L.L.P.
10250 Constellation Blvd., Suite 1700
Los Angeles, CA 90067

U.S. Trustee San Fernando Valley
915 Wilshire Blvd.
Suite 1850
Los Angeles, CA 90017

Barclay's Bank Delaware
PO BOX 8803
Wilmington, DE 19899

Buchanon Ingersoll Rooney
919 North Market Street, Suite 990
Wilmington, DE 19801

Capital One Bank USA
PO BOX 31293
Salt Lake City, UT 84131

Citicard
PO BOX 6241
Sioux Falls, SD 57117

Cred Inc. et al,
c/o Scott Cousins, Esq.
1521 Concord Pike, Suite 301
Wilmington, DE 19803

Discover Student Loans
PO BOX 30948
Salt Lake City, UT 84130

Franchise Tax Board
Special Procedures
POB 2952
Sacramento, CA 95812

Internal Revenue Service
Insolvency I Stop 5022
300 N. Los Angeles St., #4062
Los Angeles, CA 90012-9903

JP Morgan Chase

JPMCB HOME
700 KANSAS LN
Monroe, LA 71203

Los Angeles County Tax Collector
P.O. Box 54018
Los Angeles, CA 90054-0018

SOFI
2750 E COTTONWOOD PKWY
Salt Lake City, UT 84121

US Bank
PO BOX 13
Hillsboro, OH 45133

USAA
PO BOX 47504
San Antonio, TX 78265

Wells Fargo Bank
PO BOX 14517
Des Moines, IA 50306

WF Credit Services
PO BOX 14517
Des Moines, IA 50306

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address David B. Golubchik 185520 10250 Constellation Blvd., Suite 1700 Los Angeles, CA 90067 (310) 229-1234 185520 CA	FOR COURT USE ONLY
<input type="checkbox"/> Debtor(s) appearing without an attorney <input type="checkbox"/> Attorney for Debtor(s)	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO	
In re: <div style="text-align: center;">James Alexander</div>	CASE NO.: CHAPTER: 11
	DECLARATION BY DEBTOR(S) AS TO WHETHER INCOME WAS RECEIVED FROM AN EMPLOYER WITHIN 60 DAYS OF THE PETITION DATE [11 U.S.C. § 521(a)(1)(B)(iv)]
Debtor(s).	[No hearing Required]

Debtor(s) provides the following declaration(s) as to whether income was received from an employer within 60 days of the Debtor(s) filing this bankruptcy case (Petition Date), as required by 11 U.S.C. § 521(a)(1)(B)(iv):

Declaration of Debtor 1

1. ☐ I am Debtor 1 in this case, and I declare under penalty of perjury that the following information is true and correct:

During the 60-day period before the Petition Date (Check only ONE box below):

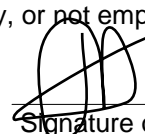
☐ **I was paid by an employer.** Attached are copies of all statements of earnings, pay stubs, or other proof of employment income I received from my employer during this 60-day period. (If the Debtor's social security number or bank account is on a pay stub or other proof of income, the Debtor must cross out (redact) the number(s) before filing this declaration.)

☒ **I was not paid by an employer** because I was either self-employed only, or not employed.

Date: February 22, 2021

James Alexander

Printed name of Debtor 1



Signature of Debtor 1

Declaration of Debtor 2 (Joint Debtor) (if applicable)

2. ☐ I am Debtor 2 in this case, and I declare under penalty of perjury that the following information is true and correct:

During the 60-day period before the Petition Date (Check only ONE box below):

☐ **I was paid by an employer.** Attached are copies of all statements of earnings, pay stubs, or other proof of employment income I received from my employer during this 60-day period. (If the Debtor's social security number or bank account is on a pay stub or other proof of income, the Debtor must cross out (redact) the number(s) before filing this declaration.)

☐ **I was not paid by an employer** because I was either self-employed only, or not employed.

Date: _____

Printed name of Debtor 2

Signature of Debtor 2

Exhibit G

Redacted in its entirety

Exhibit H

March 21, 2021

BY EMAIL

James Alexander c/o
Mark Pfeiffer/Geoffrey Grivner
Buchanan Ingersoll & Rooney PC
919 North Market Street, Suite 990
Wilmington, Delaware 19801

Re: *In re Cred Inc., et al.*, No. 20-bk-12836 (Bankr. D. Del.)

Dear Mark,

As you are aware, the Committee uncovered that your client James Alexander improperly transferred and liquidated at least 100 Bitcoin of the Debtors' assets during the pendency of the Bankruptcy Cases. Accordingly, the Committee sought emergency relief (the "Emergency Motion"), and the Court entered an emergency order requiring your client to turn over all Cred cryptocurrency and other assets in his possession and to submit to comprehensive discovery (the "Emergency Order"). Put plainly, the Court ordered that "[i]t is time for Alexander to start answering some difficult questions and do so in a way that gives the parties and the Court the ability to understand what's going on here." (Hearing Tr. at 23.)¹ Alexander has failed to comply with the Emergency Order.

We have engaged in countless emails, phone calls, and Zoom conferences in connection with our good faith efforts to obtain compliance from Alexander. On Wednesday, March 17, 2021, you asked the Committee to provide a list of outstanding items from the Emergency Order that Alexander has failed to complete. The Committee has provided these outstanding items on many occasions, but it will do so again here. The Committee requests a response, document production, and a supplemental declaration by **March 24, 2021**.

A. The Declaration is Insufficient

Alexander has failed to provide the detailed declaration required by the Emergency Order. Both of Alexander's declarations fail to provide the information required by the Emergency Order.

¹ The transcript of the hearing on the Committee's motion for emergency relief will be referred to herein as the "Hearing Tr."

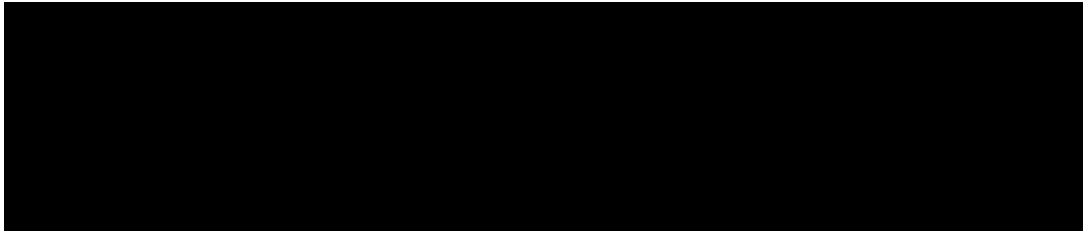
The Court ordered Alexander to “submit a declaration by sometime today that lays out exactly what he has, when he got it, how he got it, where it was transferred to, how it was liquidated, where the liquidated funds are located,” (Hearing Tr. at 24), “provide an explanation for each of the transfers subsequent to the initial transfer of all the Bitcoin, as well as an explanation for why he liquidated the Bitcoin and where that money is located,” (Hearing Tr. at 35), and “[w]hen he’s describing the transfer’s, he’s describing who the funds were – or who the Bitcoin or who the funds were transferred to and where they’re currently residing so – and not just some anonymous account number. He has to provide full disclosure here.” (Hearing Tr. at 37). Alexander has failed to do so.

Alexander failed to meet the February 4, 2021 5:00PM deadline required by the Court and submitted a completely deficient declaration on February 6, 2021 (the “Alexander Declaration”). Since the entry of the Emergency Order, the Committee has been actively seeking a declaration that complies with the requirements of the Emergency Order. Hours after receiving the Alexander Declaration, the Committee notified you, as counsel to Alexander, that the declaration was insufficient. The Committee sent comprehensive emails to you on February 7, 2021 and February 23, 2021, identifying in detail the shortcomings in the Alexander Declaration. You never substantively responded.

The Committee followed up on February 25, 2021, March 1, 2021, and March 14, 2021. Although you responded to some of these emails indicating that Alexander was “working on it,” You did not provide any substantive responses. Accordingly, the Committee moved for contempt. An hour prior to the hearing on the contempt motion, Alexander provided a supplemental declaration that failed to address any of the deficiencies outlined by the Committee (the “Alexander Supplemental Declaration”).

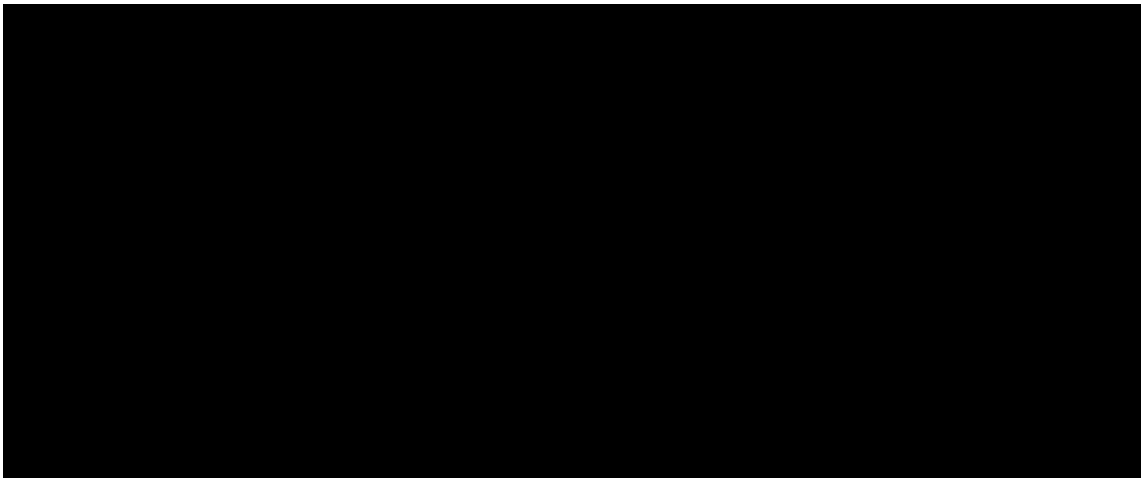
Alexander’s Supplemental Declaration does not comply with the Emergency Order. Based on documents provided by Alexander and his admissions during his deposition, we know that he engaged in at least two key liquidations of Cred Bitcoin. Alexander’s Supplemental Declaration fails to explain those liquidations and Alexander’s subsequent use of the proceeds of those liquidations.

The first known liquidation occurred in July and August of 2020 of approximately 75 Bitcoin. Alexander’s most substantial liquidation occurred on July 16, 2020 of approximately 56 Bitcoin. This was the day after Cred filed a civil complaint against Alexander in California and the day before the temporary restraining order hearing. Based on certain bank records and Alexander’s deposition testimony, it is clear that some (but not all) of the proceeds of that liquidation were ultimately remitted to a JP Morgan Chase account controlled by Alexander and subsequently transferred to a Wells Fargo Account controlled by Alexander. Following that transfer, Alexander executed a series of cash withdrawals, payments to so-called “consultants,” other transactions that appear to be personal expenses, and a series of other transactions. The Emergency Order requires Alexander to explain each of these transactions in detail. Alexander merely provides the following explanation:



This is obviously deficient. This does not explain the reasons for the transactions, the recipients of these transactions, and an explanation as to why Alexander has not returned to the Debtors these 75 Bitcoin or the proceeds derived from the liquidation.

Alexander's description is equally deficient concerning his January 16 and 17, 2021 liquidation of 100 of Cred's Bitcoin. Alexander has provided certain bank records and Coinbase account records reflecting a massive liquidation of Bitcoin, followed by significant cash withdrawals, payments to "consultants," payments for trips, payments for other expenses that appear to be personal, and a series of other transactions. Nevertheless, Alexander merely states the following with respect to the liquidation and subsequent use of 100 Bitcoin:



These descriptions are deficient. This does not explain the reasons for these transactions or any of the subsequent transfers reflected in Alexander's bank statements.

Alexander has also not explained any of his significant cash withdrawals. We have identified over \$170,000 in cash withdrawals in just one of Alexander's Wells Fargo accounts. According to Alexander, that Wells Fargo Account was a "dedicated account" funded entirely by the liquidation of Cred's cryptocurrency. Nevertheless, Alexander does not explain any of these cash withdrawals in the Alexander Declaration or Supplemental Declaration.

Alexander must comply with the Emergency Order. This is not a mere discovery dispute. Alexander has not returned any of the proceeds from the liquidation of the 75 Bitcoin in July and August of 2020 and has returned only a portion of the proceeds from the liquidation of 100 Bitcoin in January 16 and 17, 2021.

The Committee demands a supplemental declaration containing the following by **March 24, 2021**:

1. Identify in detail all cryptocurrency and fiat transactions traceable to Cred,² including (1) the date of each transaction; (2) the amount of each transaction; (3) the reason for each transaction; (4) the name and address of the natural person or entity receiving each transaction; and (5) the current location of the proceeds of each transaction.
2. Identify in detail all cryptocurrency and fiat transactions related in any way to the July and August 2020 liquidation of 75 Bitcoin and all proceeds derived therefrom, including (1) the date of each transaction; (2) the amount of each transaction; (3) the reason for each transaction; (4) the name and address of the natural person or entity receiving each transaction; and (5) the current location of the proceeds of that transaction.
3. Identify in detail all cryptocurrency and fiat transactions related in any way to the January 16 and 17, 2021 liquidation of 100 Bitcoin and all proceeds derived therefrom, including (1) the date of each transaction; (2) the amount of each transaction; (3) the reason for each transaction; (4) the name and address of the natural person or entity receiving each transaction; and (5) the current location of the proceeds of that transaction.
4. Identify in detail all transactions in the “dedicated” Wells Fargo Account (9285) and any other bank account, cryptocurrency exchange account, or digital wallet which received any of the proceeds of any sales of Cred cryptocurrency or other assets, including (1) the date of each transaction; (2) the amount of each transaction; (3) the reason for each transaction; (4) the name and address of the natural person or entity receiving each transaction; and (5) the current location of the proceeds of that transaction.

B. Alexander Has Failed to Produce Records of Known Accounts Held By Financial Institutions

The Committee knows Alexander has failed to produce bank records from known bank accounts. 41 days after the Committee served its document requests pursuant to the Emergency Order seeking account statements and other information about Alexander’s personal bank accounts, his response is simply “Alexander will provide remaining bank statements.” (*See* Alexander Responses to Phase Two Discovery Requests and Interrogatories, Response to Request 2.) Alexander needs to produce account statements and other information for all bank accounts that he owns or has access to by **March 24, 2021**.

² Alexander may limit these descriptions to transactions that exceed \$500 USD.

As you know, the Committee sent Alexander comprehensive discovery requests and interrogatories on February 5, 2021. The Committee also followed up on February 24, 2021 with a detailed email explaining that Alexander had failed to provide bank statements and other information concerning his personal bank accounts.³ As explained in the February 24, 2021 email, certain of these bank accounts received the proceeds of the liquidation of Cred Bitcoin. Alexander admitted during his deposition that at least one Wells Fargo bank account that he has not produced received the proceeds of the 75 Bitcoin he liquidated in July and August of 2020. (Alexander Dep. Tr. at 104.) During the deposition, with respect to that Wells Fargo account, counsel stated “I will note for the record that information will be provided pursuant to the part two discovery that has been requested.” (Alexander Dep. Tr. at 104.) However, Alexander still has not produced documents concerning that account or any other of his accounts. The Committee has also identified other bank accounts in the Alexander Schedules that he has yet to produce.

Alexander has also produced sparing productions related to his cryptocurrency exchange accounts. The Committee has merely received “transaction history reports” from Alexander’s Coinbase accounts. These reports do not reflect any fiat transactions or show how Alexander funded these accounts. Coinbase is a financial institution that maintains comprehensive records for every account, including records of all fiat transactions. Similarly, Alexander merely provided one excel file concerning his LedgerLive wallet. The Committee is also aware that Alexander maintains accounts with DAI, but he has not produced any records concerning those accounts. Alexander is required to produce all records concerning all of his accounts held at cryptocurrency exchanges and digital wallets.

Accordingly, the Committee demands that Alexander produce the following by **March 24, 2021**:

1. All account statements, records, documents, and correspondence concerning all accounts at financial institutions that Alexander owns or has access to. This request pertains to any and all bank accounts, cryptocurrency exchange accounts, digital wallets, and accounts with any cryptocurrency or blockchain company which Alexander has had access to in the last 24 months.
2. All account statements, records, documents, and correspondence concerning the following bank accounts:
 - a. The Wells Fargo account that transferred \$500,000 into Alexander’s JP Morgan Chase Account (6006). (See JP Morgan Chase (6006), July 31, 2020 Account Statement, at 10 [REDACTED])

³ Alexander produced some account statements for one Wells Fargo Account (9285), one DIP account, and one J.P. Morgan Chase account.

- [REDACTED]
- b. The Alexander Custom Management bank account – This account received the “salary,” the \$100,000 “prepaid salary,” and a series of other bank transfers from the “dedicated” Wells Fargo account (9285). (See Alexander Dep. Tr. at 43 (“Q. There was \$100,000 transferred out of this account on February 4th, 2021 to an account held by Alexander Custom Management. The Account Alexander Custom Management is owned and controlled by you, right? A. Yes.”)).
 - c. Wells Fargo Account (1923). (See Alexander Schedules at 6.)⁴
 - d. Wells Fargo Account (2155). (See Alexander Schedules at 6.)
 - e. “Other Wells Fargo.” (See Alexander Schedules at 7.)
 - f. DIP Wells Fargo Account (0816). (See Alexander Schedules at 6.)

C. Alexander Simply Refers to his Personal “Bankruptcy Schedules” in Response to Interrogatories and Document Requests, but his Bankruptcy Schedules are Demonstrably Incomplete

Alexander does not substantively respond and just refers to the “bankruptcy schedules” for 25 of 28 interrogatories and 10 of 17 document requests. This is insufficient for a number of reasons. Perhaps the most important reason is the fact that Alexander’s Schedules are demonstrably incomplete.

For example, on Alexander’s Schedules on Official Form 106A/B, Alexander lists that he has “0” cash in his possession. Alexander testified that he had \$60,000 in the trunk of his car on February 9, 2021. We have also identified significant repeated cash withdrawals from the “dedicated” Cred Wells Fargo bank account of over \$170,000. You represented that Alexander has transferred all cash in his possession to his Debtor in Possession bank account (the “DIP Account”). But we have received a copy of the account statement from the DIP Account and there are no such cash deposits. Alexander withdrew a significant amount of cash and his simple reference to the Alexander’s Schedules which list “0” cash is plainly insufficient.

As another example, Alexander stated that all cryptocurrency, cryptocurrency accounts, and digital wallets that he owns or has access to are set forth in the Alexander Schedules. But Alexander’s Schedules list zero cryptocurrency accounts and no digital wallets. This too is false. Alexander maintains at least two (and likely more) Coinbase accounts, Alexander owns at least one “off-exchange” ledgerlive wallet, and Alexander maintains a DAI account. Alexander only discloses in the Alexander Schedules that he controls one Bitcoin and some LBA tokens. The Committee knows that Alexander has other cryptocurrency in his ledgerlive wallet and that he

⁴ The schedules that Alexander submitted in connection with his personal bankruptcy will be referred to herein as the “Alexander Schedules.”

has other cryptocurrency including Ethereum and DAI. The Committee strongly suspects that Alexander controls other cryptocurrency that he has not disclosed.

Alexander has also not provided other basic information that the Committee requested. This includes personal financial statements and any applications he has made in connection with mortgage lenders and other credit applications.

The Committee demands the following by **March 24, 2021**:

1. Produce documents responsive to the Committee's document requests, without reference to the Alexander Schedules.
2. Respond to the Committee's interrogatory responses, without reference to the Alexander Schedules.

D. Alexander Provided Unmarked Documents Without any Explanation

Alexander produced some unmarked documents the night before the contempt hearing. They appear to reflect some transactions. Alexander produced unmarked .pdfs, which do not appear to be bank records, and do not contain headers, footers, or other identifiers. We requested an explanation about what these documents are on March 17, 2021. Please explain what these documents are by **March 24, 2021**.

* * *

As you know, the Committee is aggressively pursuing Alexander's compliance with the Emergency Order. As directed by Judge Dorsey, the Committee will be seeking relief from the United States District Court for the District of Delaware. The Committee demands compliance by **March 24, 2021**. This request is without prejudice to all other rights and remedies. In connection with this submission, the Committee reserves all rights and waives none.

Sincerely,



Timothy W. Walsh

CC: Darren Azman (dazman@mwe.com)
Joseph Evans (jbevans@mwe.com)

Exhibit I

Redacted: Pages 865 - 1511



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March 30, 2021

VIA ELECTRONIC MAIL

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Re: *In re Cred Inc., et al.*, No 20-bk-12836 (Bankr. D. Del.)

Dear Timothy:

I write on behalf of James Alexander (“Mr. Alexander”) in response to your March 21, 2021 letter (the “Letter”) on behalf of the Official Committee of Unsecured Creditors in the above-referenced action. We have conferred with our client and have obtained further information to supplement Mr. Alexander’s prior productions and submissions based on your Letter. Enclosed herewith, please find:

- A Second Supplemental Declaration of James Alexander, providing further information as to the July 1-16, 2020 and January 16-17, 2021 transactions;
- A supplemental production of documents including:
 - Account statements from June 2019 through January 2021 for Mr. Alexander’s JP Morgan Chase Bank, N.A. account ending x6006;
 - Account statements from August 2020 through February 2021 and a Check Register for Mr. Alexander’s Wells Fargo Business Choice Checking account (dba James Alexander Cred) ending x9285;

March 30, 2021

Page - 2 -

- Account statements from June 2019 through February 2021 and a Check Register for Mr. Alexander's Wells Fargo Custom Management Checking account ending x1923;
- Account statements from February 2021 for Mr. Alexander's Wells Fargo Everyday Checking account (Debtor in Possession Ch 11 Case 12-10214 (CCA)) ending x0816;
- Account statements from June 2019 through February 2021 for Mr. Alexander's Wells Fargo Business Everyday Checking account ending x2155;
- Account statements from July 2020 through February 2021 for Mr. Alexander's Wells Fargo Way2Save Savings account ending x6552;
- A screen shot of Mr. Alexander's Bittrex account;¹ and
- Screen shots of Mr. Alexander's Coinbase account.

In your Letter, you requested additional documentation related to Mr. Alexander's Coinbase account, apart from the transaction reports that were provided in connection with Mr. Alexander's initial production of documents. I understand that the Coinbase transaction reports that have already provided are complete records as to all transactions that occurred in the Coinbase accounts. As such, there are no additional documents to be provided related to that account.

Your Letter also requested additional documentation related to Mr. Alexander's LedgerLive wallet, apart from the transaction reports provided in connection with Mr. Alexander's initial production of documents. I understand from Mr. Alexander that the file called "ledgerlive-operations-2021.02.07.csv" provided to you on February 7, 2021 is the complete record of all transactions that occurred on the Hardware Wallet.² Additionally, any transaction that occurred in the Hardware Wallet is publicly available through <https://etherscan.io/> ("Etherscan") which allows for verification of all transactions provided in the Hardware Wallet. The Official Committee is also in possession of the Seed Phrase that allows control of the Hardware Wallet and which would enable them to perform any operation. Since providing this seed phrase around February 7, Mr. Alexander no longer has unique control of the Hardware Wallet and anybody in possession of the

¹ As I believe was noted previously, Mr. Alexander's Bittrex account has been disabled for several months. Efforts are ongoing to get the account re-enabled. As soon as the assets are available, the LBA will be transferred to the Debtor and the BTC will be transferred to the California Bankruptcy Trustee.

² LedgerLive is an "app" that links to the Hardware Wallet. LedgerLive transactions are only possibly through the Hardware Wallet.

March 30, 2021

Page - 3 -

Seed Phrase could undertake any transaction in this Hardware Wallet. The Blockchain and crypto transactions offer publicly verifiable and complete transparency.

Your Letter further requested documentation related to Mr. Alexander's accounts with DAI. I understand from Mr. Alexander that DAI is a stable coin which would be an asset in the Coinbase or LedgerLive accounts. As noted above, the complete transactions histories for Coinbase and Ledger accounts have been provided. Any DAI transactions would be captured in the transaction histories and can be verified publicly through Etherscan. Although already referenced in the Coinbase accounts, there is a Coinbase wallet linked to a Coinbase account. For clarity, the publicly-available data related to this wallet can be accessed at: <https://etherscan.io/address/0xb390258d2b0c9e384014a9108366786aec334fc3>. This provides an example of how any transaction can be publicly reconciled within the Coinbase or Hardware Wallet.

Your Letter also requested clarification as to certain PDFs produced to you on March 16th. These documents produced in PDF format to you were provided to me by Mr. Alexander as Excel files titled "Checking3", "Checking3 (1)", and "Checking3 (2)". Mr. Alexander has explained to me that these documents are .csv records of all activity in Mr. Alexander's Wells Fargo Custom Management Checking account ending x1923. These PDFs previously provided are supplemented by the statements provided herewith, as noted above.

Further, your Letter requested further supplementation of Mr. Alexander's Declaration. Enclosed herewith please find a Second Supplemental Declaration of James Alexander which elaborates on the July 1-16, 2020 and January 16-17, 2020 transactions as well as the status of the \$60,000 cash Mr. Alexander disclosed in the February 9, 2021 deposition. If you have questions related to any individual expenses from the liquidated bitcoin (listed in the Wells Fargo "dba Cred Capital" account ending x9285), these should be specified.

Should you have any questions, please feel free to contact me at your convenience.

Respectfully submitted,

/s/ Geoffrey G. Grivner

Geoffrey G. Grivner, Esq.

Cc: Darren Azman (via E-Mail)
Joseph B. Evans (via E-Mail)
Mark Pfeiffer (via E-Mail)
James Alexander (via E-Mail)

Exhibit J

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CRED INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-12836 (JTD)

Jointly Administered

NOTICE OF TRANSFER OF ASSETS

PLEASE TAKE NOTICE THAT, at the direction of the Court following the hearing on February 5, 2021, James Alexander transferred the identified Bitcoin and USD stablecoin to Debtors' representative pursuant to the instructions received from those representatives, except for a small amount of additional cryptocurrency that he and the Debtors' representative were unable to transfer for technical reasons. The parties agreed to revisit this issue and Mr. Alexander remains committed to effectuating the transfer of this cryptocurrency at the earliest possible moment.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Geoffrey G. Grivner

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Attorneys for James Alexander

Dated: February 6, 2021

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Cred Inc. (8268), Cred (US) LLC (5799), Cred Capital, Inc. (4064), Cred Merchant Solutions LLC (3150), Cred (Puerto Rico) LLC (3566). The Debtors' mailing address is 3 East Third Avenue, San Mateo, California 94401.